

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RACHEL BRANNON, DAVID BRANNON,
DONALD CRUSOE, JR., SHARIKKA DAVIS,
DEDRIC DEES, GREGORY DURM,
OCTAVIA HALL, JUSTIN JONES,
SHANYEKA LACEY, JOSHUA MARCET,
KRISTI OWENS, CHARLES SHEARER,
JOHN STRIPLING, CARANELL TONEY,
JOHN WINTERS, TERESA YARBROUGH,
JOSE COLOSIO, GLEN FISHER, JOSE
MUNOZ, RYAN SACZAWA, ANTHONY
TERRY, SHERRI CARTWRIGHT,
TYTARIAN COLLINS, REGINAL
MCKISSICK, PEGGY RIVERA, LISA SCOTT,
SHAWN ANTOINE, JOSE ARANA PEREZ,
SAUL AYON, FERNANDO CANTU, ALLEN
CARRILLO, EDWIN CHAGOYA, RANDALL
CLARY, JOSE CORTEZ-VELARDE,
CATHERINE DAHLSTROM, MARJORIE
ESKES, PAUL GOMEZ, LESLIE HASKINS,
FERNANDO HERNANDEZ, FRANCISCO
IGLESIAS, JAMES JOHNSON, GERALD
JOHNSON, CHAD JOHNSON, SR., PAUL
KING, ANTIONETTE MARTINEZ,
ARNULFO NORIEGA, GUSTAVO
OLIVEROS, JAASIEL ORTEGA, DUSTIN
SMITH, MARTY THOMAS, JR., KELVIN
WALLACE, SARINA WIXSON, ARTIN
YOUSEFI, KRYSTAL JOHNSON, JESSICA
KEY, SAMUEL PEREZ, RYAN BOLDUK,
ALEXIS CRUZ, JASON CUEVAS, RICHARD
GOULDSBROUGH, GARY KING, JAMIE
POWERS, YAHMIRA REYES, RICHARD
SOTO, ROBERT COX, ALAN DULIS,
ROBERT LEONARD, JOHN ADAMES,
CURTIS ANDERSON, ERIC BEISCHER,
FELIX BENCOSME, KEVIN BETHEA,
ANDREA BILLIK, JOHN BOWDEN,
HERBERT CAMPBELL, KENNETH
CHOWTIE, JAMES COKER, WILLIE
CUYLER, CHARLESON DORCEUS, ALYOU
DOUMBIA, GARY FUGITT, EDWIN
GARCIA PEREZ, JEFF GENTILE, GARY
GRAHAM, GARY GRULLON, BENJAMIN

No.

ELECTRONICALLY FILED
DOCUMENT

JURY DEMANDED

HARRIS, LARRY JACOBS, MARIO
JARAMILLO ESCALANTE , MUSTAPHA
KADDOUH, JAMES KLEIN, LUKASZ KLIS,
BRANDON LEWIS, AARON MAYNARD,
KESLEY MCDONALD, ALEX PHANORD,
SHIRVAN RAUSEO-DANCLAIR, DAVID
REDDEN, BRETT SMITH, ATORI THOMAS,
MARQUIZ WALKER, ALBERT WARMAN,
CHASSIDY WHITE, JOSEPH AMERSON,
LUIS AREIZA, RAY BEARD, KRISTEN
BOWERS, DARIUS BROOKS, JERMAINE
BURKES, CATHERINE COLTON, KRISTA
FORD, NATASHA FOSTER, ROBERT
HARRIS, MAURICE HINES, ARCHIE
HOWARD, FREDERICK KELLEY, WYATT
LINDSEY, PAMELA OLIVER, TREYVON
ROSS, SHAQUAN SHUMAKE, DENNIS
SMITH, BRITTNEY TERRELL, MONTOVIES
TURNER, JAMES WHISNANT, RYAN
WHITE, CAROLYN WILLIAMS, MICHAEL
BLOCK, FRANCISCO CANTU, JAMES
CRIPPS, PAULA GALLAGHER, ALPHONSO
GARY, RICHARD HAWKES, JOHN
HAYMER, DANIEL HENRY , ROSEMARY
JOHNSON, PETER JUAREZ, CHARLENE
MAAHS, A PALLADINETTI, TROY
REYNOLDS, CEDRIC SMITH, MORIAH
SUTTON, RONALD TINDALL, SHANDI
BEADLES, REGINA BRIGHTWELL, DAVID
CLAYTON, MIKE GALLO, KEVIN MOORE,
DAWN PUSEY, CHRISTOPHER
RUMSCHLAG, CAROLYN WILLIAMS,
KENNETH WILSON, GARY COOK, SHANE
EBAUGH, MATTHEW SPINDEN,
CHRISTAPHER HINKLE, CHRISTOPHER
NEYFELDT, MICHAEL BOLTON, JEREMY
BROWN, TRAVIS COLLINS, JAMES
DILLWORTH, STEPHEN DYKES, SARAH
LAWS, REGINALD WILKINS, JERROLD
BANKS, SHARON BRADLEY, KESHA
CELESTINE, CARMELLA DEMOUCHET,
NICOLE FRANCIS, BREONNE GILES,
KYRA JOHNSON, CHERYL TAYLOR,
SHAYAIKEYA THOMPSON, RONNIE
WASHINGTON, ALEX BLAU, BENJAMIN
DIXON, MARVIN CRADLE, KENYA

CURTIS, TEYAH HART, TIMOTHY HEWLIN, TONYA HILL, MACK LAURY, PEDRO MORA ORTIZ, JASMINE PENDERGRASS, MALCOLM DRAPER, ANTHONY GOGGANS, PARKER KIRCHINGER, MIKE LUBBERS, WILLIAM MARTIN, MICHAEL OLSSON, JOSHUA SANDERS, JOHN SHILLING, LORI STEIN, STEVEN ACKERMAN, CODY DROBNICK, KENNETH YANG, CHRISTOPHER BAZINET, TERESA BROOKS, BRANDON HARRIS, MICHELLE JACKSON, HARVEY ROGERS, KALSO SLATER, KENNETH SMITH, PHYLLIS TATE, MICHAEL TYLER, BRANDI WATSON, BRADLEY BARHAM, ROLANDA CARTER, ORLANDO FOSTER, ALAN GIBLER, DAMION HAMILTON, KYLE KLUTTS, DENNIS MALINE, JOHN MOORE, PHILLIP NEALE, JOHNIE SCHATZLER, JERON SHAW, RICKIE SLATER, LORNA WHELAN, CRAIG DECELLES, COLE TOMBRE, CYNTHIA BEARDSOWELL, JACKIE MCGOWAN, JUSTIN CURTIS, RICHAR FENCO, PHILIP HOFFMAN, EDWARD LACOMBE, ORLANDO MCCALMON, KENNY MERCADO, GERARDO PEREZ, KYLE BARNETT, JOHNNY CANDELARIA, BRENDEN JUSTINIANO, KAYLENA BAKER, JUSTIN BALSAMO, SALVATORE CATARINICCHIA, CALMAR CLARKE, SHARON FAUGHNAN, MANUEL FELIZ CEPIN, JR., JAMEL HARRISON, CARISSA MCMURRAY, LUIS MERLO, RONALD MERROW, ANTHONY OWENS, PETER OZUNA, KENNETH POWIS, JACK PUTNAM, SHAWN VEAUNT, TWANA WHITE, JEREMY BAKER, NADINE CLEMENT, MILTON EWING, DEAS FENDERSON, REBEKAH FORTENBERRY, QUINCY GLOVER, SR., OLEKSANDR GRAKOV, CASEY HICKS, MATTHEW HOLLOWAY, MICHAEL MARSH, ANSHAWN PITTMAN, RICHIE RYAN, TRENTON WYLIE, AMANDA MOFFITT, JAY ADLER, JEFFREY CARPENTER,

SCOTTY DODGE, DOUG DORSEL,
CHARLES GRANT, SHON HOLDREN,
WILLIAM MARTIN, RYAN MOSS,
SHANNON WYSZYNSKI, JAMES ALLEN,
CHRISTOPHER FRYE, TYLER HOLTON,
DAVID KREH, SCOTT SMITH, COLTON
TATTERSHALL, KENNETH THOMASON,
MAROUT ANTONIAN, CORY BRIDGER,
DEREK JACKSON, BRITTANY MILLER,
MICHAEL MUTTON, EDWIN BERRIER,
TONYA BLAND, LELAND CANADY,
JOHNSTON CARTER, TYLER CLAY,
KENNETH COOK, WILDER DOMOND,
BRIAN ETTER, CHRIS JANIS, FRANK
LOVARI, GEORGE MASON, BLAISE
MCGINLEY, MICHAEL METENEY,
CHARLOTTE WYNN, MICHAEL MYERS,
BEN BRYSON, PAYSHA BURGESS,
ANTHONY CARROLL, JOHN HACKETT,
KEVIN HAYES, ALVIN HINTON,
DEQUALAIS OLIVER, STEPHANIE SMALL,
TAIWAN SMITH, SCOTT SMITH, COLBY
BUCKLES, JAMES ALLEN, MICHAEL
BARTUSCH, DUNCAN BEASLEY,
PRESTON DEPIETRO, JEFFREY DITTMER,
TRACEY DRAKE, STEVEN EDGIN,
CHRISTOPHER FREEMAN, CHRISTOPHER
GOLDEN, DAVID GORNOWICZ, GARY
HENRY, CHARLES JACKSON, JAMAL
JARVIS, FREDERICK JONES, DENISHA
LEWIS, BRIAN MCDAVID, LARRY
MCLERRAN, JASON REED, JEROME
RUBIN, JOHNATHON SCHULTZ,
REMOLINO TORRES, BRYAN
WACHSMUTH, GEORGE ACKERMAN,
JEREMY AGUIRRE, GERARDO
ALMENDAREZ, JR., ROBERT BAKER,
PATRICIA BONNER, QUNTEVIA
BRADSHAW, DONNA BRYAN, ISRAEL
BUENO, WILLIE DAVIS, GREGORY
DIXON, JAMES FOXWORTH, GARY
HATFIELD, RICHARD HONEYCUTT,
CHARLES HOSEA, DARRELL HUNT,
XAVIER JONES, MICHAEL LARSEN,
DEJON LAWRENCE, MILDRED MANLEY,
JOEL MARTINEZ, CAROLYN MCBRIDE,

MARIO MORANTE, NEVIN PASTRANO,
ELLIOT RAYNOR, BRANDON REYNOLDS,
JASON ROGERS, LUKE STEWART,
QUAYLON SUTTON, ELIZABETH
TROJNOR RILEY, ANGELA WADLEY,
CLINT WILLIAMS, MIKE FOOTE, THOMAS
TIMOTHY, LEE BAYLESS, REYNARD
BLACK, JR., ARTURO BROWN, DOYLE
CARDWELL, RODNEY CLARK, DALE
DENNIS, AHMAD GRANBY, JAMES
GUSLER, MARK JONES, FELECIA
MADISON, JORDAN ORR, CLIFTON
RICHARDSON, HOPE ROGERS, ESTHER
WALTON, RUBEN DELGADO, DON
JOHNSON, MAGRAND KOL, TERRA
MCGINN, JENNIFER PINGREE, DONAVAN
SATTEWHITE, TIM SCHULTHEIS,
PATRICK SULLIVAN, SCOTT VENG, NEIL
AUSTEN, DEVIN BOYCE, LANCE
SCHULTZ, DONALD BARBER, NICHOLAS
BUCHER, ANTHONY CRISWELL, JAMES
EBERLE, SANDESH GURUNG, ANGELINA
GUTHRIE, MATTHEW LUND, KRISTINE
MEINHARDT, DANIEL SCHIMANSKI,
RICHARD WALKER, and LARRY YATES,

Plaintiffs,

v.

FEDEX GROUND PACKAGE SYSTEM, INC.
and FEDEX CORPORATION

Defendants.

COMPLAINT

Plaintiffs bring this action against Defendants FedEx Ground Package System, Inc. and FedEx Corporation (collectively, “FedEx”) for violations of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §§ 201, *et seq.*, as well as under the laws of California, Colorado, New Mexico, New York, and Washington.

JURISDICTION AND VENUE

1. Jurisdiction is proper under 29 U.S.C. § 216(b) and 28 U.S.C. § 1331.
2. Venue is proper under 28 U.S.C. § 1391(b)(2).

PARTIES

3. Plaintiff Rachel Brannon is an individual residing in Alabama. Brannon worked as a delivery driver for FedEx in Alabama from approximately 2016 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Brannon has been eligible to receive overtime pay under the FLSA because Brannon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

4. Plaintiff David Brannon is an individual residing in Alabama. Brannon worked as a delivery driver for FedEx in Alabama from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Brannon has been eligible to receive overtime pay under the FLSA because Brannon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

5. Plaintiff Donald Crusoe, Jr. is an individual residing in Alabama. Crusoe worked as a delivery driver for FedEx in Alabama from approximately 2018 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Crusoe has been eligible to receive overtime pay under the FLSA because Crusoe has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

6. Plaintiff Sharikka Davis is an individual residing in Alabama. Davis worked as a delivery driver for FedEx in Alabama from approximately 2009 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Davis has been eligible to receive overtime pay under the FLSA because Davis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

7. Plaintiff Dedric Dees is an individual residing in Alabama. Dees worked as a delivery driver for FedEx in Alabama from approximately 2013 to 2026 but was employed through intermediary entities that FedEx calls independent service providers. Dees has been eligible to receive overtime pay under the FLSA because Dees has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

8. Plaintiff Gregory Durm is an individual residing in Tennessee. Durm worked as a delivery driver for FedEx in Alabama but was employed through intermediary entities that FedEx calls independent service providers. Durm has been eligible to receive overtime pay under the FLSA because Durm has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

9. Plaintiff Octavia Hall is an individual residing in Alabama. Hall worked as a delivery driver for FedEx in Alabama from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Hall has been eligible to receive overtime pay under the FLSA because Hall has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

10. Plaintiff Justin Jones is an individual residing in Alabama. Jones worked as a delivery driver for FedEx in Alabama from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Jones has been eligible to receive overtime pay under the FLSA because Jones has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

11. Plaintiff Shanyeka Lacey is an individual residing in Alabama. Lacey worked as a delivery driver for FedEx in Alabama from approximately 2014 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Lacey has been eligible to receive overtime pay under the FLSA because Lacey has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

12. Plaintiff Joshua Marcet is an individual residing in Alabama. Marcet worked as a delivery driver for FedEx in Alabama from approximately 2017 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Marcet has been eligible to receive overtime pay under the FLSA because Marcet has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

13. Plaintiff Kristi Owens is an individual residing in Alabama. Owens worked as a delivery driver for FedEx in Alabama from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Owens has been eligible to receive overtime pay under the FLSA because Owens has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

14. Plaintiff Charles Shearer is an individual residing in Alabama. Shearer worked as a delivery driver for FedEx in Alabama from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Shearer has been eligible to receive overtime pay under the FLSA because Shearer has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

15. Plaintiff John Stripling is an individual residing in Alabama. Stripling worked as a delivery driver for FedEx in Alabama but was employed through intermediary entities that FedEx calls independent service providers. Stripling has been eligible to receive overtime pay under the FLSA because Stripling has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

16. Plaintiff Caranell Toney is an individual residing in Alabama. Toney worked as a delivery driver for FedEx in Alabama from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Toney has been eligible to receive overtime pay under the FLSA because Toney has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

17. Plaintiff John Winters is an individual residing in Alabama. Winters worked as a delivery driver for FedEx in Alabama from approximately 2015 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Winters has been eligible to receive overtime pay under the FLSA because Winters has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

18. Plaintiff Teresa Yarbrough is an individual residing in Alabama. Yarbrough worked as a delivery driver for FedEx in Alabama from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Yarbrough has been eligible to receive overtime pay under the FLSA because Yarbrough has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

19. Plaintiff Jose Colosio is an individual residing in Arizona. Colosio worked as a delivery driver for FedEx in Arizona from approximately 2011 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Colosio has been eligible to receive overtime pay under the FLSA because Colosio has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

20. Plaintiff Glen Fisher is an individual residing in Arizona. Fisher worked as a delivery driver for FedEx in Arizona from approximately 2000 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Fisher has been eligible to receive overtime pay under the FLSA because Fisher has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

21. Plaintiff Jose Munoz is an individual residing in Arizona. Munoz worked as a delivery driver for FedEx in Arizona from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Munoz has been

eligible to receive overtime pay under the FLSA because Munoz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

22. Plaintiff Ryan Saczawa is an individual residing in Arizona. Saczawa worked as a delivery driver for FedEx in Arizona from approximately 2013 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Saczawa has been eligible to receive overtime pay under the FLSA because Saczawa has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

23. Plaintiff Anthony Terry is an individual residing in Arizona. Terry worked as a delivery driver for FedEx in Arizona from approximately 2021 to 2025 but was employed through intermediary entities that FedEx calls independent service providers. Terry has been eligible to receive overtime pay under the FLSA because Terry has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

24. Plaintiff Sherri Cartwright is an individual residing in Arkansas. Cartwright worked as a delivery driver for FedEx in Arkansas from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Cartwright has been eligible to receive overtime pay under the FLSA because Cartwright has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

25. Plaintiff Tytarian Collins is an individual residing in Arkansas. Collins worked as a delivery driver for FedEx in Arkansas from approximately 2016 to 2018 but was employed

through intermediary entities that FedEx calls independent service providers. Collins has been eligible to receive overtime pay under the FLSA because Collins has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

26. Plaintiff Reginal Mckissick is an individual residing in Arkansas. Mckissick worked as a delivery driver for FedEx in Arkansas from approximately 2008 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Mckissick has been eligible to receive overtime pay under the FLSA because Mckissick has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

27. Plaintiff Peggy Rivera is an individual residing in Arkansas. Rivera worked as a delivery driver for FedEx in Arkansas from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Rivera has been eligible to receive overtime pay under the FLSA because Rivera has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

28. Plaintiff Lisa Scott is an individual residing in Arkansas. Scott worked as a delivery driver for FedEx in Arkansas from approximately 2013 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Scott has been eligible to receive overtime pay under the FLSA because Scott has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

29. Plaintiff Shawn Antoine is an individual residing in California. Antoine worked as a delivery driver for FedEx in California from approximately 1996 to 2030 but was employed through intermediary entities that FedEx calls independent service providers. Antoine has been eligible to receive overtime pay under the FLSA because Antoine has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

30. Plaintiff Jose Arana Perez is an individual residing in California. Arana Perez worked as a delivery driver for FedEx in California from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Arana Perez has been eligible to receive overtime pay under the FLSA because Arana Perez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

31. Plaintiff Saul Ayon is an individual residing in California. Ayon worked as a delivery driver for FedEx in California from approximately 2005 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Ayon has been eligible to receive overtime pay under the FLSA because Ayon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

32. Plaintiff Fernando Cantu is an individual residing in California. Cantu worked as a delivery driver for FedEx in California but was employed through intermediary entities that FedEx calls independent service providers. Cantu has been eligible to receive overtime pay under the FLSA because Cantu has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

33. Plaintiff Allen Carrillo is an individual residing in California. Carrillo worked as a delivery driver for FedEx in California from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Carrillo has been eligible to receive overtime pay under the FLSA because Carrillo has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

34. Plaintiff Edwin Chagoya is an individual residing in California. Chagoya worked as a delivery driver for FedEx in California from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Chagoya has been eligible to receive overtime pay under the FLSA because Chagoya has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

35. Plaintiff Randall Clary is an individual residing in California. Clary worked as a delivery driver for FedEx in California from approximately 2014 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Clary has been eligible to receive overtime pay under the FLSA because Clary has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

36. Plaintiff Jose Cortez-Velarde is an individual residing in California. Cortez-Velarde worked as a delivery driver for FedEx in California from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Cortez-Velarde has been eligible to receive overtime pay under the FLSA because Cortez-

Velarde has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

37. Plaintiff Catherine Dahlstrom is an individual residing in California. Dahlstrom worked as a delivery driver for FedEx in California from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers.

Dahlstrom has been eligible to receive overtime pay under the FLSA because Dahlstrom has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

38. Plaintiff Marjorie Eskes is an individual residing in Nevada. Eskes worked as a delivery driver for FedEx in California from approximately 2000 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Eskes has been eligible to receive overtime pay under the FLSA because Eskes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

39. Plaintiff Paul Gomez is an individual residing in California. Gomez worked as a delivery driver for FedEx in California from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Gomez has been eligible to receive overtime pay under the FLSA because Gomez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

40. Plaintiff Leslie Haskins is an individual residing in Virginia. Haskins worked as a delivery driver for FedEx in California from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Haskins has been

eligible to receive overtime pay under the FLSA because Haskins has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

41. Plaintiff Fernando Hernandez is an individual residing in California. Hernandez worked as a delivery driver for FedEx in California from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Hernandez has been eligible to receive overtime pay under the FLSA because Hernandez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

42. Plaintiff Francisco Iglesias is an individual residing in California. Iglesias worked as a delivery driver for FedEx in California from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Iglesias has been eligible to receive overtime pay under the FLSA because Iglesias has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

43. Plaintiff James Johnson is an individual residing in California. Johnson worked as a delivery driver for FedEx in California from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

44. Plaintiff Gerald Johnson is an individual residing in California. Johnson worked as a delivery driver for FedEx in California from approximately 2010 to 2024 but was employed

through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

45. Plaintiff Chad Johnson, Sr. is an individual residing in Oregon. Johnson worked as a delivery driver for FedEx in California from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

46. Plaintiff Paul King is an individual residing in California. King worked as a delivery driver for FedEx in California from approximately 2010 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. King has been eligible to receive overtime pay under the FLSA because King has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

47. Plaintiff Antionette Martinez is an individual residing in California. Martinez worked as a delivery driver for FedEx in California from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Martinez has been eligible to receive overtime pay under the FLSA because Martinez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

48. Plaintiff Arnulfo Noriega is an individual residing in Washington. Noriega worked as a delivery driver for FedEx in California from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Noriega has been eligible to receive overtime pay under the FLSA because Noriega has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

49. Plaintiff Gustavo Oliveros is an individual residing in California. Oliveros worked as a delivery driver for FedEx in California from approximately 2013 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Oliveros has been eligible to receive overtime pay under the FLSA because Oliveros has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

50. Plaintiff Jaasiel Ortega is an individual residing in California. Ortega worked as a delivery driver for FedEx in California from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Ortega has been eligible to receive overtime pay under the FLSA because Ortega has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

51. Plaintiff Dustin Smith is an individual residing in California. Smith worked as a delivery driver for FedEx in California from approximately 2015 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

52. Plaintiff Marty Thomas, Jr. is an individual residing in California. Thomas worked as a delivery driver for FedEx in California from approximately 2017 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Thomas has been eligible to receive overtime pay under the FLSA because Thomas has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

53. Plaintiff Kelvin Wallace is an individual residing in California. Wallace worked as a delivery driver for FedEx in California from approximately 2016 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Wallace has been eligible to receive overtime pay under the FLSA because Wallace has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

54. Plaintiff Sarina Wixson is an individual residing in California. Wixson worked as a delivery driver for FedEx in California from approximately 2016 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Wixson has been eligible to receive overtime pay under the FLSA because Wixson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

55. Plaintiff Artin Yousefi is an individual residing in California. Yousefi worked as a delivery driver for FedEx in California from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Yousefi has been

eligible to receive overtime pay under the FLSA because Yousefi has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

56. Plaintiff Krystal Johnson is an individual residing in Colorado. Johnson worked as a delivery driver for FedEx in Colorado from approximately 2012 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

57. Plaintiff Jessica Key is an individual residing in Colorado. Key worked as a delivery driver for FedEx in Colorado but was employed through intermediary entities that FedEx calls independent service providers. Key has been eligible to receive overtime pay under the FLSA because Key has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

58. Plaintiff Samuel Perez is an individual residing in California. Perez worked as a delivery driver for FedEx in Colorado from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Perez has been eligible to receive overtime pay under the FLSA because Perez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

59. Plaintiff Ryan Bolduk is an individual residing in Connecticut. Bolduk worked as a delivery driver for FedEx in Connecticut from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Bolduk has been

eligible to receive overtime pay under the FLSA because Bolduk has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

60. Plaintiff Alexis Cruz is an individual residing in Connecticut. Cruz worked as a delivery driver for FedEx in Connecticut from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Cruz has been eligible to receive overtime pay under the FLSA because Cruz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

61. Plaintiff Jason Cuevas is an individual residing in Connecticut. Cuevas worked as a delivery driver for FedEx in Connecticut but was employed through intermediary entities that FedEx calls independent service providers. Cuevas has been eligible to receive overtime pay under the FLSA because Cuevas has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

62. Plaintiff Richard Gouldsbrough is an individual residing in Connecticut. Gouldsbrough worked as a delivery driver for FedEx in Connecticut from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Gouldsbrough has been eligible to receive overtime pay under the FLSA because Gouldsbrough has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

63. Plaintiff Gary King is an individual residing in Connecticut. King worked as a delivery driver for FedEx in Connecticut from approximately 2008 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. King has been

eligible to receive overtime pay under the FLSA because King has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

64. Plaintiff Jamie Powers is an individual residing in Connecticut. Powers worked as a delivery driver for FedEx in Connecticut and Massachusetts from approximately 2007 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Powers has been eligible to receive overtime pay under the FLSA because Powers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

65. Plaintiff Yahmira Reyes is an individual residing in Connecticut. Reyes worked as a delivery driver for FedEx in Connecticut from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Reyes has been eligible to receive overtime pay under the FLSA because Reyes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

66. Plaintiff Richard Soto is an individual residing in Connecticut. Soto worked as a delivery driver for FedEx in Connecticut but was employed through intermediary entities that FedEx calls independent service providers. Soto has been eligible to receive overtime pay under the FLSA because Soto has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

67. Plaintiff Robert Cox is an individual residing in Delaware. Cox worked as a delivery driver for FedEx in Delaware from approximately 2013 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Cox has been

eligible to receive overtime pay under the FLSA because Cox has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

68. Plaintiff Alan Dulis is an individual residing in Delaware. Dulis worked as a delivery driver for FedEx in Delaware from approximately 2006 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Dulis has been eligible to receive overtime pay under the FLSA because Dulis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

69. Plaintiff Robert Leonard is an individual residing in Maryland. Leonard worked as a delivery driver for FedEx in Delaware from approximately 2013 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Leonard has been eligible to receive overtime pay under the FLSA because Leonard has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

70. Plaintiff John Adames is an individual residing in Florida. Adames worked as a delivery driver for FedEx in Florida from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Adames has been eligible to receive overtime pay under the FLSA because Adames has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

71. Plaintiff Curtis Anderson is an individual residing in Florida. Anderson worked as a delivery driver for FedEx in Florida from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Anderson has been

eligible to receive overtime pay under the FLSA because Anderson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

72. Plaintiff Eric Beischer is an individual residing in Florida. Beischer worked as a delivery driver for FedEx in Florida from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Beischer has been eligible to receive overtime pay under the FLSA because Beischer has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

73. Plaintiff Felix Bencosme is an individual residing in Florida. Bencosme worked as a delivery driver for FedEx in Florida from approximately 2018 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Bencosme has been eligible to receive overtime pay under the FLSA because Bencosme has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

74. Plaintiff Kevin Bethea is an individual residing in Florida. Bethea worked as a delivery driver for FedEx in Florida from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Bethea has been eligible to receive overtime pay under the FLSA because Bethea has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

75. Plaintiff Andrea Billik is an individual residing in Florida. Billik worked as a delivery driver for FedEx in Florida from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Billik has been eligible to

receive overtime pay under the FLSA because Billik has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

76. Plaintiff John Bowden is an individual residing in Ohio. Bowden worked as a delivery driver for FedEx in Florida from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Bowden has been eligible to receive overtime pay under the FLSA because Bowden has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

77. Plaintiff Herbert Campbell is an individual residing in Florida. Campbell worked as a delivery driver for FedEx in Florida from approximately 2014 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Campbell has been eligible to receive overtime pay under the FLSA because Campbell has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

78. Plaintiff Kenneth Chowtie is an individual residing in Maryland. Chowtie worked as a delivery driver for FedEx in Florida from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Chowtie has been eligible to receive overtime pay under the FLSA because Chowtie has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

79. Plaintiff James Coker is an individual residing in Florida. Coker worked as a delivery driver for FedEx in Florida from approximately 2000 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Coker has been eligible to

receive overtime pay under the FLSA because Coker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

80. Plaintiff Willie Cuyler is an individual residing in Florida. Cuyler worked as a delivery driver for FedEx in Florida from approximately 2020 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Cuyler has been eligible to receive overtime pay under the FLSA because Cuyler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

81. Plaintiff Charleson Dorceus is an individual residing in Florida. Dorceus worked as a delivery driver for FedEx in Florida from approximately 2015 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Dorceus has been eligible to receive overtime pay under the FLSA because Dorceus has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

82. Plaintiff Alyou Doumbia is an individual residing in Florida. Doumbia worked as a delivery driver for FedEx in Florida but was employed through intermediary entities that FedEx calls independent service providers. Doumbia has been eligible to receive overtime pay under the FLSA because Doumbia has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

83. Plaintiff Gary Fugitt is an individual residing in Florida. Fugitt worked as a delivery driver for FedEx in Florida from approximately 2011 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Fugitt has been eligible to receive overtime pay under the FLSA because Fugitt has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

84. Plaintiff Edwin Garcia Perez is an individual residing in Florida. Garcia Perez worked as a delivery driver for FedEx in Florida from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Garcia Perez has been eligible to receive overtime pay under the FLSA because Garcia Perez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

85. Plaintiff Jeff Gentile is an individual residing in Florida. Gentile worked as a delivery driver for FedEx in Florida from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Gentile has been eligible to receive overtime pay under the FLSA because Gentile has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

86. Plaintiff Gary Graham is an individual residing in Florida. Graham worked as a delivery driver for FedEx in Florida from approximately 2014 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Graham has been eligible to receive overtime pay under the FLSA because Graham has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

87. Plaintiff Gary Grullon is an individual residing in Florida. Grullon worked as a delivery driver for FedEx in Florida from approximately 2017 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Grullon has been eligible to receive overtime pay under the FLSA because Grullon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

88. Plaintiff Benjamin Harris is an individual residing in South Carolina. Harris worked as a delivery driver for FedEx in Florida from approximately 2016 to 2021 but was

employed through intermediary entities that FedEx calls independent service providers. Harris has been eligible to receive overtime pay under the FLSA because Harris has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

89. Plaintiff Larry Jacobs is an individual residing in Florida. Jacobs worked as a delivery driver for FedEx in Florida from approximately 2014 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Jacobs has been eligible to receive overtime pay under the FLSA because Jacobs has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

90. Plaintiff Mario Jaramillo Escalante is an individual residing in Florida. Jaramillo Escalante worked as a delivery driver for FedEx in Florida from approximately 2000 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Jaramillo Escalante has been eligible to receive overtime pay under the FLSA because Jaramillo Escalante has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

91. Plaintiff Mustapha Kaddouh is an individual residing in Florida. Kaddouh worked as a delivery driver for FedEx in Florida from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Kaddouh has been eligible to receive overtime pay under the FLSA because Kaddouh has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

92. Plaintiff James Klein is an individual residing in Florida. Klein worked as a delivery driver for FedEx in Florida from approximately 2015 to 2016 but was employed through

intermediary entities that FedEx calls independent service providers. Klein has been eligible to receive overtime pay under the FLSA because Klein has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

93. Plaintiff Lukasz Klis is an individual residing in Illinois. Klis worked as a delivery driver for FedEx in Florida from approximately 2013 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Klis has been eligible to receive overtime pay under the FLSA because Klis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

94. Plaintiff Brandon Lewis is an individual residing in Florida. Lewis worked as a delivery driver for FedEx in Florida but was employed through intermediary entities that FedEx calls independent service providers. Lewis has been eligible to receive overtime pay under the FLSA because Lewis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

95. Plaintiff Aaron Maynard is an individual residing in Florida. Maynard worked as a delivery driver for FedEx in Florida from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Maynard has been eligible to receive overtime pay under the FLSA because Maynard has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

96. Plaintiff Kesley McDonald is an individual residing in South Carolina. McDonald worked as a delivery driver for FedEx in Florida from approximately 2020 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. McDonald has been eligible to receive overtime pay under the FLSA because McDonald has

driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

97. Plaintiff Alex Phanord is an individual residing in Florida. Phanord worked as a delivery driver for FedEx in Florida from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Phanord has been eligible to receive overtime pay under the FLSA because Phanord has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

98. Plaintiff Shirvan Rauseo-Danclair is an individual residing in Florida. Rauseo-Danclair worked as a delivery driver for FedEx in Florida from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Rauseo-Danclair has been eligible to receive overtime pay under the FLSA because Rauseo-Danclair has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

99. Plaintiff David Redden is an individual residing in Indiana. Redden worked as a delivery driver for FedEx in Florida from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Redden has been eligible to receive overtime pay under the FLSA because Redden has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

100. Plaintiff Brett Smith is an individual residing in Florida. Smith worked as a delivery driver for FedEx in Florida but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the

FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

101. Plaintiff Atori Thomas is an individual residing in Florida. Thomas worked as a delivery driver for FedEx in Florida from approximately 2014 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Thomas has been eligible to receive overtime pay under the FLSA because Thomas has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

102. Plaintiff Marquiz Walker is an individual residing in Florida. Walker worked as a delivery driver for FedEx in Florida from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Walker has been eligible to receive overtime pay under the FLSA because Walker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

103. Plaintiff Albert Warman is an individual residing in Florida. Warman worked as a delivery driver for FedEx in Florida from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Warman has been eligible to receive overtime pay under the FLSA because Warman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

104. Plaintiff Chassidy White is an individual residing in Florida. White worked as a delivery driver for FedEx in Florida but was employed through intermediary entities that FedEx calls independent service providers. White has been eligible to receive overtime pay under the FLSA because White has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

105. Plaintiff Joseph Amerson is an individual residing in Georgia. Amerson worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Amerson has been eligible to receive overtime pay under the FLSA because Amerson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

106. Plaintiff Luis Areiza is an individual residing in Florida. Areiza worked as a delivery driver for FedEx in Georgia from approximately 1997 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Areiza has been eligible to receive overtime pay under the FLSA because Areiza has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

107. Plaintiff Ray Beard is an individual residing in Georgia. Beard worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Beard has been eligible to receive overtime pay under the FLSA because Beard has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

108. Plaintiff Kristen Bowers is an individual residing in Georgia. Bowers worked as a delivery driver for FedEx in Georgia from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Bowers has been eligible to receive overtime pay under the FLSA because Bowers has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

109. Plaintiff Darius Brooks is an individual residing in Georgia. Brooks worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Brooks has been eligible to receive overtime pay under the FLSA because Brooks has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

110. Plaintiff Jermaine Burkes is an individual residing in Georgia. Burkes worked as a delivery driver for FedEx in Georgia from approximately 2014 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Burkes has been eligible to receive overtime pay under the FLSA because Burkes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

111. Plaintiff Catherine Colton is an individual residing in Georgia. Colton worked as a delivery driver for FedEx in Georgia from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Colton has been eligible to receive overtime pay under the FLSA because Colton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

112. Plaintiff Krista Ford is an individual residing in Georgia. Ford worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Ford has been

eligible to receive overtime pay under the FLSA because Ford has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

113. Plaintiff Natasha Foster is an individual residing in Georgia. Foster worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Foster has been eligible to receive overtime pay under the FLSA because Foster has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

114. Plaintiff Robert Harris is an individual residing in Georgia. Harris worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Harris has been eligible to receive overtime pay under the FLSA because Harris has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

115. Plaintiff Maurice Hines is an individual residing in Georgia. Hines worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Hines has been eligible to receive overtime pay under the FLSA because Hines has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

116. Plaintiff Archie Howard is an individual residing in Georgia. Howard worked as a delivery driver for FedEx in Georgia from approximately 2012 to 2019 but was employed

through intermediary entities that FedEx calls independent service providers. Howard has been eligible to receive overtime pay under the FLSA because Howard has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

117. Plaintiff Frederick Kelley is an individual residing in Georgia. Kelley worked as a delivery driver for FedEx in Georgia from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Kelley has been eligible to receive overtime pay under the FLSA because Kelley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

118. Plaintiff Wyatt Lindsey is an individual residing in Georgia. Lindsey worked as a delivery driver for FedEx in Georgia from approximately 2015 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Lindsey has been eligible to receive overtime pay under the FLSA because Lindsey has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

119. Plaintiff Pamela Oliver is an individual residing in Georgia. Oliver worked as a delivery driver for FedEx in Georgia from approximately 2001 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Oliver has been eligible to receive overtime pay under the FLSA because Oliver has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

120. Plaintiff Treyvon Ross is an individual residing in Georgia. Ross worked as a delivery driver for FedEx in Georgia from approximately 2012 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Ross has been eligible to receive overtime pay under the FLSA because Ross has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

121. Plaintiff Shaquan Shumake is an individual residing in Georgia. Shumake worked as a delivery driver for FedEx in Georgia from approximately 2014 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Shumake has been eligible to receive overtime pay under the FLSA because Shumake has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

122. Plaintiff Dennis Smith is an individual residing in Georgia. Smith worked as a delivery driver for FedEx in Georgia but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

123. Plaintiff Brittney Terrell is an individual residing in Georgia. Terrell worked as a delivery driver for FedEx in Georgia from approximately 2013 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Terrell has been eligible to receive overtime pay under the FLSA because Terrell has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

124. Plaintiff Montovies Turner is an individual residing in Georgia. Turner worked as a delivery driver for FedEx in Georgia but was employed through intermediary entities that FedEx calls independent service providers. Turner has been eligible to receive overtime pay under the FLSA because Turner has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

125. Plaintiff James Whisnant is an individual residing in Georgia. Whisnant worked as a delivery driver for FedEx in Georgia but was employed through intermediary entities that FedEx calls independent service providers. Whisnant has been eligible to receive overtime pay under the FLSA because Whisnant has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

126. Plaintiff Ryan White is an individual residing in Georgia. White worked as a delivery driver for FedEx in Georgia but was employed through intermediary entities that FedEx calls independent service providers. White has been eligible to receive overtime pay under the FLSA because White has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

127. Plaintiff Carolyn Williams is an individual residing in Georgia. Williams worked as a delivery driver for FedEx in Georgia but was employed through intermediary entities that FedEx calls independent service providers. Williams has been eligible to receive overtime pay under the FLSA because Williams has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

128. Plaintiff Michael Block is an individual residing in Illinois. Block worked as a delivery driver for FedEx in Illinois from approximately 2006 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Block has been eligible to

receive overtime pay under the FLSA because Block has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

129. Plaintiff Francisco Cantu is an individual residing in Illinois. Cantu worked as a delivery driver for FedEx in Illinois but was employed through intermediary entities that FedEx calls independent service providers. Cantu has been eligible to receive overtime pay under the FLSA because Cantu has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

130. Plaintiff James Cripps is an individual residing in Illinois. Cripps worked as a delivery driver for FedEx in Illinois from approximately 2014 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Cripps has been eligible to receive overtime pay under the FLSA because Cripps has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

131. Plaintiff Paula Gallagher is an individual residing in Illinois. Gallagher worked as a delivery driver for FedEx in Illinois from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Gallagher has been eligible to receive overtime pay under the FLSA because Gallagher has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

132. Plaintiff Alphonso Gary is an individual residing in Illinois. Gary worked as a delivery driver for FedEx in Illinois but was employed through intermediary entities that FedEx calls independent service providers. Gary has been eligible to receive overtime pay under the FLSA because Gary has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

133. Plaintiff Richard Hawkes is an individual residing in Illinois. Hawkes worked as a delivery driver for FedEx in Illinois from approximately 2017 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Hawkes has been eligible to receive overtime pay under the FLSA because Hawkes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

134. Plaintiff John Haymer is an individual residing in Illinois. Haymer worked as a delivery driver for FedEx in Illinois from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Haymer has been eligible to receive overtime pay under the FLSA because Haymer has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

135. Plaintiff Daniel Henry is an individual residing in Illinois. Henry worked as a delivery driver for FedEx in Illinois from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Henry has been eligible to receive overtime pay under the FLSA because Henry has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

136. Plaintiff Rosemary Johnson is an individual residing in Illinois. Johnson worked as a delivery driver for FedEx in Illinois from but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

137. Plaintiff Peter Juarez is an individual residing in Illinois. Juarez worked as a delivery driver for FedEx in Illinois from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Juarez has been eligible to

receive overtime pay under the FLSA because Juarez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

138. Plaintiff Charlene Maahs is an individual residing in Alabama. Maahs worked as a delivery driver for FedEx in Illinois but was employed through intermediary entities that FedEx calls independent service providers. Maahs has been eligible to receive overtime pay under the FLSA because Maahs has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

139. Plaintiff A Palladinetti is an individual residing in Illinois. Palladinetti worked as a delivery driver for FedEx in Illinois from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Palladinetti has been eligible to receive overtime pay under the FLSA because Palladinetti has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

140. Plaintiff Troy Reynolds is an individual residing in Illinois. Reynolds worked as a delivery driver for FedEx in Illinois from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Reynolds has been eligible to receive overtime pay under the FLSA because Reynolds has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

141. Plaintiff Cedric Smith is an individual residing in Illinois. Smith worked as a delivery driver for FedEx in Illinois from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to

receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

142. Plaintiff Moriah Sutton is an individual residing in Illinois. Sutton worked as a delivery driver for FedEx in Illinois from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Sutton has been eligible to receive overtime pay under the FLSA because Sutton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

143. Plaintiff Ronald Tindall is an individual residing in Illinois. Tindall worked as a delivery driver for FedEx in Illinois from approximately 2014 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Tindall has been eligible to receive overtime pay under the FLSA because Tindall has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

144. Plaintiff Shandi Beadles is an individual residing in Indiana. Beadles worked as a delivery driver for FedEx in Indiana from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Beadles has been eligible to receive overtime pay under the FLSA because Beadles has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

145. Plaintiff Regina Brightwell is an individual residing in Indiana. Brightwell worked as a delivery driver for FedEx in Indiana from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Brightwell has been eligible to receive overtime pay under the FLSA because Brightwell has

driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

146. Plaintiff David Clayton is an individual residing in Indiana. Clayton worked as a delivery driver for FedEx in Indiana from approximately 2013 to 2022-10-21 but was employed through intermediary entities that FedEx calls independent service providers. Clayton has been eligible to receive overtime pay under the FLSA because Clayton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

147. Plaintiff Mike Gallo is an individual residing in South Carolina. Gallo worked as a delivery driver for FedEx in Indiana from approximately 2012 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Gallo has been eligible to receive overtime pay under the FLSA because Gallo has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

148. Plaintiff Kevin Moore is an individual residing in Illinois. Moore worked as a delivery driver for FedEx in Indiana from approximately 2014 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Moore has been eligible to receive overtime pay under the FLSA because Moore has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

149. Plaintiff Dawn Pusey is an individual residing in Indiana. Pusey worked as a delivery driver for FedEx in Indiana from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Pusey has been

eligible to receive overtime pay under the FLSA because Pusey has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

150. Plaintiff Christopher Rumschlag is an individual residing in Indiana. Rumschlag worked as a delivery driver for FedEx in Indiana from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Rumschlag has been eligible to receive overtime pay under the FLSA because Rumschlag has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

151. Plaintiff Carolyn Williams is an individual residing in Indiana. Williams worked as a delivery driver for FedEx in Indiana from approximately 2016 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Williams has been eligible to receive overtime pay under the FLSA because Williams has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

152. Plaintiff Kenneth Wilson is an individual residing in Indiana. Wilson worked as a delivery driver for FedEx in Indiana from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Wilson has been eligible to receive overtime pay under the FLSA because Wilson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

153. Plaintiff Gary Cook is an individual residing in Iowa. Cook worked as a delivery driver for FedEx in Iowa from approximately 2017 to 2018 but was employed through

intermediary entities that FedEx calls independent service providers. Cook has been eligible to receive overtime pay under the FLSA because Cook has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

154. Plaintiff Shane Ebaugh is an individual residing in Iowa. Ebaugh worked as a delivery driver for FedEx in Iowa from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Ebaugh has been eligible to receive overtime pay under the FLSA because Ebaugh has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

155. Plaintiff Matthew Spinden is an individual residing in Iowa. Spinden worked as a delivery driver for FedEx in Iowa but was employed through intermediary entities that FedEx calls independent service providers. Spinden has been eligible to receive overtime pay under the FLSA because Spinden has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

156. Plaintiff Christopher Hinkle is an individual residing in Kansas. Hinkle worked as a delivery driver for FedEx in Kansas from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Hinkle has been eligible to receive overtime pay under the FLSA because Hinkle has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

157. Plaintiff Christopher Neyfeldt is an individual residing in Kansas. Neyfeldt worked as a delivery driver for FedEx in Kansas from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Neyfeldt has been eligible to receive overtime pay under the FLSA because Neyfeldt has driven a vehicle

weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

158. Plaintiff Michael Bolton is an individual residing in Kentucky. Bolton worked as a delivery driver for FedEx in Kentucky from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Bolton has been eligible to receive overtime pay under the FLSA because Bolton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

159. Plaintiff Jeremy Brown is an individual residing in Kentucky. Brown worked as a delivery driver for FedEx in Kentucky but was employed through intermediary entities that FedEx calls independent service providers. Brown has been eligible to receive overtime pay under the FLSA because Brown has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

160. Plaintiff Travis Collins is an individual residing in Kentucky. Collins worked as a delivery driver for FedEx in Kentucky from approximately 2015 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Collins has been eligible to receive overtime pay under the FLSA because Collins has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

161. Plaintiff James Dillworth is an individual residing in Kentucky. Dillworth worked as a delivery driver for FedEx in Kentucky from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Dillworth has been eligible to receive overtime pay under the FLSA because Dillworth has driven a vehicle

weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

162. Plaintiff Stephen Dykes is an individual residing in Kentucky. Dykes worked as a delivery driver for FedEx in Kentucky from approximately 2014 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Dykes has been eligible to receive overtime pay under the FLSA because Dykes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

163. Plaintiff Sarah Laws is an individual residing in Tennessee. Laws worked as a delivery driver for FedEx in Kentucky from approximately 2012 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Laws has been eligible to receive overtime pay under the FLSA because Laws has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

164. Plaintiff Reginald Wilkins is an individual residing in Kentucky. Wilkins worked as a delivery driver for FedEx in Kentucky from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Wilkins has been eligible to receive overtime pay under the FLSA because Wilkins has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

165. Plaintiff Jerrold Banks is an individual residing in Louisiana. Banks worked as a delivery driver for FedEx in Louisiana from approximately 2014 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Banks has been

eligible to receive overtime pay under the FLSA because Banks has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

166. Plaintiff Sharon Bradley is an individual residing in Louisiana. Bradley worked as a delivery driver for FedEx in Louisiana from approximately 2013 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Bradley has been eligible to receive overtime pay under the FLSA because Bradley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

167. Plaintiff Kesha Celestine is an individual residing in Louisiana. Celestine worked as a delivery driver for FedEx in Louisiana from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Celestine has been eligible to receive overtime pay under the FLSA because Celestine has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

168. Plaintiff Carmella Demouchet is an individual residing in Louisiana. Demouchet worked as a delivery driver for FedEx in Louisiana from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Demouchet has been eligible to receive overtime pay under the FLSA because Demouchet has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

169. Plaintiff Nicole Francis is an individual residing in Louisiana. Francis worked as a delivery driver for FedEx in Louisiana from approximately 2012 to 2024 but was employed

through intermediary entities that FedEx calls independent service providers. Francis has been eligible to receive overtime pay under the FLSA because Francis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

170. Plaintiff Breonne Giles is an individual residing in Louisiana. Giles worked as a delivery driver for FedEx in Louisiana from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Giles has been eligible to receive overtime pay under the FLSA because Giles has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

171. Plaintiff Kyra Johnson is an individual residing in Louisiana. Johnson worked as a delivery driver for FedEx in Louisiana from approximately 2014 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

172. Plaintiff Cheryl Taylor is an individual residing in Louisiana. Taylor worked as a delivery driver for FedEx in Louisiana from approximately 2013 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Taylor has been eligible to receive overtime pay under the FLSA because Taylor has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

173. Plaintiff Shayaikeya Thompson is an individual residing in Louisiana. Thompson worked as a delivery driver for FedEx in Louisiana from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Thompson has been eligible to receive overtime pay under the FLSA because Thompson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

174. Plaintiff Ronnie Washington is an individual residing in Louisiana. Washington worked as a delivery driver for FedEx in Louisiana from approximately 2010 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Washington has been eligible to receive overtime pay under the FLSA because Washington has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

175. Plaintiff Alex Blau is an individual residing in Maine. Blau worked as a delivery driver for FedEx in Maine from approximately 2018 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Blau has been eligible to receive overtime pay under the FLSA because Blau has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

176. Plaintiff Benjamin Dixon is an individual residing in Maine. Dixon worked as a delivery driver for FedEx in Maine but was employed through intermediary entities that FedEx calls independent service providers. Dixon has been eligible to receive overtime pay under the FLSA because Dixon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

177. Plaintiff Marvin Cradle is an individual residing in District of Columbia. Cradle worked as a delivery driver for FedEx in Maryland and Virginia from approximately 2013 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Cradle has been eligible to receive overtime pay under the FLSA because Cradle has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

178. Plaintiff Kenya Curtis is an individual residing in Maryland. Curtis worked as a delivery driver for FedEx in Maryland from approximately 2014 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Curtis has been eligible to receive overtime pay under the FLSA because Curtis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

179. Plaintiff Teyah Hart is an individual residing in Maryland. Hart worked as a delivery driver for FedEx in Maryland from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Hart has been eligible to receive overtime pay under the FLSA because Hart has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

180. Plaintiff Timothy Hewlin is an individual residing in Maryland. Hewlin worked as a delivery driver for FedEx in Maryland from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Hewlin has been eligible to receive overtime pay under the FLSA because Hewlin has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

181. Plaintiff Tonya Hill is an individual residing in Maryland. Hill worked as a delivery driver for FedEx in Maryland from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Hill has been eligible to receive overtime pay under the FLSA because Hill has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

182. Plaintiff Mack Laury is an individual residing in Maryland. Laury worked as a delivery driver for FedEx in Maryland from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Laury has been eligible to receive overtime pay under the FLSA because Laury has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

183. Plaintiff Pedro Mora Ortiz is an individual residing in Maryland. Mora Ortiz worked as a delivery driver for FedEx in Maryland from approximately 2015 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Mora Ortiz has been eligible to receive overtime pay under the FLSA because Mora Ortiz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

184. Plaintiff Jasmine Pendergrass is an individual residing in Maryland. Pendergrass worked as a delivery driver for FedEx in Maryland from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers.

Pendergrass has been eligible to receive overtime pay under the FLSA because Pendergrass has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

185. Plaintiff Malcolm Draper is an individual residing in Michigan. Draper worked as a delivery driver for FedEx in Michigan but was employed through intermediary entities that FedEx calls independent service providers. Draper has been eligible to receive overtime pay under the FLSA because Draper has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

186. Plaintiff Anthony Goggans is an individual residing in Michigan. Goggans worked as a delivery driver for FedEx in Michigan from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Goggans has been eligible to receive overtime pay under the FLSA because Goggans has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

187. Plaintiff Parker Kirchner is an individual residing in Michigan. Kirchner worked as a delivery driver for FedEx in Michigan from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Kirchner has been eligible to receive overtime pay under the FLSA because Kirchner has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

188. Plaintiff Mike Lubbers is an individual residing in Michigan. Lubbers worked as a delivery driver for FedEx in Michigan but was employed through intermediary entities that FedEx calls independent service providers. Lubbers has been eligible to receive overtime pay

under the FLSA because Lubbers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

189. Plaintiff William Martin is an individual residing in Michigan. Martin worked as a delivery driver for FedEx in Michigan but was employed through intermediary entities that FedEx calls independent service providers. Martin has been eligible to receive overtime pay under the FLSA because Martin has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

190. Plaintiff Michael Olsson is an individual residing in Michigan. Olsson worked as a delivery driver for FedEx in Michigan but was employed through intermediary entities that FedEx calls independent service providers. Olsson has been eligible to receive overtime pay under the FLSA because Olsson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

191. Plaintiff Joshua Sanders is an individual residing in Michigan. Sanders worked as a delivery driver for FedEx in Michigan but was employed through intermediary entities that FedEx calls independent service providers. Sanders has been eligible to receive overtime pay under the FLSA because Sanders has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

192. Plaintiff John Shilling is an individual residing in Michigan. Shilling worked as a delivery driver for FedEx in Michigan from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Shilling has been eligible to receive overtime pay under the FLSA because Shilling has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

193. Plaintiff Lori Stein is an individual residing in Michigan. Stein worked as a delivery driver for FedEx in Michigan from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Stein has been eligible to receive overtime pay under the FLSA because Stein has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

194. Plaintiff Steven Ackerman is an individual residing in Minnesota. Ackerman worked as a delivery driver for FedEx in Minnesota from approximately 2010 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Ackerman has been eligible to receive overtime pay under the FLSA because Ackerman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

195. Plaintiff Cody Drobnick is an individual residing in Minnesota. Drobnick worked as a delivery driver for FedEx in Minnesota from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Drobnick has been eligible to receive overtime pay under the FLSA because Drobnick has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

196. Plaintiff Kenneth Yang is an individual residing in Minnesota. Yang worked as a delivery driver for FedEx in Minnesota from approximately 2014 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Yang has been eligible to receive overtime pay under the FLSA because Yang has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

197. Plaintiff Christopher Bazinet is an individual residing in Mississippi. Bazinet worked as a delivery driver for FedEx in Mississippi from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Bazinet has been eligible to receive overtime pay under the FLSA because Bazinet has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

198. Plaintiff Teresa Brooks is an individual residing in Mississippi. Brooks worked as a delivery driver for FedEx in Mississippi from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Brooks has been eligible to receive overtime pay under the FLSA because Brooks has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

199. Plaintiff Brandon Harris is an individual residing in Mississippi. Harris worked as a delivery driver for FedEx in Mississippi but was employed through intermediary entities that FedEx calls independent service providers. Harris has been eligible to receive overtime pay under the FLSA because Harris has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

200. Plaintiff Michelle Jackson is an individual residing in Mississippi. Jackson worked as a delivery driver for FedEx in Mississippi from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Jackson has been eligible to receive overtime pay under the FLSA because Jackson has driven a vehicle

weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

201. Plaintiff Harvey Rogers is an individual residing in Mississippi. Rogers worked as a delivery driver for FedEx in Mississippi from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Rogers has been eligible to receive overtime pay under the FLSA because Rogers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

202. Plaintiff Kalso Slater is an individual residing in Mississippi. Slater worked as a delivery driver for FedEx in Mississippi from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Slater has been eligible to receive overtime pay under the FLSA because Slater has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

203. Plaintiff Kenneth Smith is an individual residing in Mississippi. Smith worked as a delivery driver for FedEx in Mississippi from approximately 2010 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

204. Plaintiff Phyllis Tate is an individual residing in Mississippi. Tate worked as a delivery driver for FedEx in Mississippi from approximately 2005 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Tate has been

eligible to receive overtime pay under the FLSA because Tate has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

205. Plaintiff Michael Tyler is an individual residing in Mississippi. Tyler worked as a delivery driver for FedEx in Mississippi but was employed through intermediary entities that FedEx calls independent service providers. Tyler has been eligible to receive overtime pay under the FLSA because Tyler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

206. Plaintiff Brandi Watson is an individual residing in Mississippi. Watson worked as a delivery driver for FedEx in Mississippi from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Watson has been eligible to receive overtime pay under the FLSA because Watson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

207. Plaintiff Bradley Barham is an individual residing in Missouri. Barham worked as a delivery driver for FedEx in Missouri from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Barham has been eligible to receive overtime pay under the FLSA because Barham has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

208. Plaintiff Rolanda Carter is an individual residing in Missouri. Carter worked as a delivery driver for FedEx in Missouri from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Carter has been

eligible to receive overtime pay under the FLSA because Carter has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

209. Plaintiff Orlando Foster is an individual residing in Missouri. Foster worked as a delivery driver for FedEx in Missouri from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Foster has been eligible to receive overtime pay under the FLSA because Foster has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

210. Plaintiff Alan Gibler is an individual residing in Missouri. Gibler worked as a delivery driver for FedEx in Missouri but was employed through intermediary entities that FedEx calls independent service providers. Gibler has been eligible to receive overtime pay under the FLSA because Gibler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

211. Plaintiff Damion Hamilton is an individual residing in Missouri. Hamilton worked as a delivery driver for FedEx in Missouri from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Hamilton has been eligible to receive overtime pay under the FLSA because Hamilton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

212. Plaintiff Kyle Klutts is an individual residing in Missouri. Klutts worked as a delivery driver for FedEx in Missouri from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Klutts has been

eligible to receive overtime pay under the FLSA because Klutts has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

213. Plaintiff Dennis Maline is an individual residing in Kansas. Maline worked as a delivery driver for FedEx in Missouri from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Maline has been eligible to receive overtime pay under the FLSA because Maline has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

214. Plaintiff John Moore is an individual residing in Missouri. Moore worked as a delivery driver for FedEx in Missouri from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Moore has been eligible to receive overtime pay under the FLSA because Moore has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

215. Plaintiff Phillip Neale is an individual residing in Missouri. Neale worked as a delivery driver for FedEx in Missouri from approximately 2013 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Neale has been eligible to receive overtime pay under the FLSA because Neale has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

216. Plaintiff Johnie Schatzler is an individual residing in Missouri. Schatzler worked as a delivery driver for FedEx in Missouri but was employed through intermediary entities that

FedEx calls independent service providers. Schatzler has been eligible to receive overtime pay under the FLSA because Schatzler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

217. Plaintiff Jeron Shaw is an individual residing in Georgia. Shaw worked as a delivery driver for FedEx in Missouri from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Shaw has been eligible to receive overtime pay under the FLSA because Shaw has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

218. Plaintiff Rickie Slater is an individual residing in Missouri. Slater worked as a delivery driver for FedEx in Missouri from approximately 2011 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Slater has been eligible to receive overtime pay under the FLSA because Slater has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

219. Plaintiff Lorna Whelan is an individual residing in Missouri. Whelan worked as a delivery driver for FedEx in Missouri from approximately 2015 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Whelan has been eligible to receive overtime pay under the FLSA because Whelan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

220. Plaintiff Craig Decelles is an individual residing in Montana. Decelles worked as a delivery driver for FedEx in Montana from approximately 2008 to 2017 but was employed

through intermediary entities that FedEx calls independent service providers. Decelles has been eligible to receive overtime pay under the FLSA because Decelles has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

221. Plaintiff Cole Tombre is an individual residing in Montana. Tombre worked as a delivery driver for FedEx in Montana from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Tombre has been eligible to receive overtime pay under the FLSA because Tombre has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

222. Plaintiff Cynthia Beardsowell is an individual residing in Nevada. Beardsowell worked as a delivery driver for FedEx in Nevada but was employed through intermediary entities that FedEx calls independent service providers. Beardsowell has been eligible to receive overtime pay under the FLSA because Beardsowell has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

223. Plaintiff Jackie McGowan is an individual residing in Pennsylvania. McGowan worked as a delivery driver for FedEx in Nevada from approximately 2014 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. McGowan has been eligible to receive overtime pay under the FLSA because McGowan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

224. Plaintiff Justin Curtis is an individual residing in New Jersey. Curtis worked as a delivery driver for FedEx in New Jersey but was employed through intermediary entities that

FedEx calls independent service providers. Curtis has been eligible to receive overtime pay under the FLSA because Curtis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

225. Plaintiff Richar Fenco is an individual residing in New Jersey. Fenco worked as a delivery driver for FedEx in New Jersey from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Fenco has been eligible to receive overtime pay under the FLSA because Fenco has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

226. Plaintiff Philip Hoffman is an individual residing in New Jersey. Hoffman worked as a delivery driver for FedEx in New Jersey from approximately 2011 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Hoffman has been eligible to receive overtime pay under the FLSA because Hoffman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

227. Plaintiff Edward Lacombe is an individual residing in New Jersey. Lacombe worked as a delivery driver for FedEx in New Jersey but was employed through intermediary entities that FedEx calls independent service providers. Lacombe has been eligible to receive overtime pay under the FLSA because Lacombe has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

228. Plaintiff Orlando Mccalmon is an individual residing in New Jersey. Mccalmon worked as a delivery driver for FedEx in New Jersey from approximately 2010 to 2024 but was employed through intermediary entities that FedEx calls independent service providers.

Mccalmon has been eligible to receive overtime pay under the FLSA because Mccalmon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

229. Plaintiff Kenny Mercado is an individual residing in New Jersey. Mercado worked as a delivery driver for FedEx in New Jersey from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Mercado has been eligible to receive overtime pay under the FLSA because Mercado has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

230. Plaintiff Gerardo Perez is an individual residing in New Jersey. Perez worked as a delivery driver for FedEx in New Jersey from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Perez has been eligible to receive overtime pay under the FLSA because Perez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

231. Plaintiff Kyle Barnett is an individual residing in New Mexico. Barnett worked as a delivery driver for FedEx in New Mexico from approximately 2020 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Barnett has been eligible to receive overtime pay under the FLSA because Barnett has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

232. Plaintiff Johnny Candelaria is an individual residing in New Mexico. Candelaria worked as a delivery driver for FedEx in New Mexico from approximately 2015 to 2022 but was

employed through intermediary entities that FedEx calls independent service providers.

Candelaria has been eligible to receive overtime pay under the FLSA because Candelaria has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

233. Plaintiff Brenden Justiniano is an individual residing in New Mexico. Justiniano worked as a delivery driver for FedEx in New Mexico from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Justiniano has been eligible to receive overtime pay under the FLSA because Justiniano has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

234. Plaintiff Kaylena Baker is an individual residing in New York. Baker worked as a delivery driver for FedEx in New York from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Baker has been eligible to receive overtime pay under the FLSA because Baker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

235. Plaintiff Justin Balsamo is an individual residing in North Carolina. Balsamo worked as a delivery driver for FedEx in New York from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Balsamo has been eligible to receive overtime pay under the FLSA because Balsamo has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

236. Plaintiff Salvatore Catarinicchia is an individual residing in New York. Catarinicchia worked as a delivery driver for FedEx in New York but was employed through intermediary entities that FedEx calls independent service providers. Catarinicchia has been eligible to receive overtime pay under the FLSA because Catarinicchia has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

237. Plaintiff Calmar Clarke is an individual residing in Texas. Clarke worked as a delivery driver for FedEx in New York from approximately 2013 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Clarke has been eligible to receive overtime pay under the FLSA because Clarke has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

238. Plaintiff Sharon Faughnan is an individual residing in New York. Faughnan worked as a delivery driver for FedEx in New York from approximately 2017 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Faughnan has been eligible to receive overtime pay under the FLSA because Faughnan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

239. Plaintiff Manuel Feliz Cepin, Jr. is an individual residing in New York. Feliz Cepin worked as a delivery driver for FedEx in New York from approximately 2014 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Feliz Cepin has been eligible to receive overtime pay under the FLSA because Feliz Cepin has

driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

240. Plaintiff Jamel Harrison is an individual residing in Pennsylvania. Harrison worked as a delivery driver for FedEx in New York from approximately 2013 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Harrison has been eligible to receive overtime pay under the FLSA because Harrison has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

241. Plaintiff Carissa McMurray is an individual residing in New York. McMurray worked as a delivery driver for FedEx in New York from approximately 2017 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. McMurray has been eligible to receive overtime pay under the FLSA because McMurray has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

242. Plaintiff Luis Merlo is an individual residing in New York. Merlo worked as a delivery driver for FedEx in New York from approximately 2020 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Merlo has been eligible to receive overtime pay under the FLSA because Merlo has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

243. Plaintiff Ronald Merrow is an individual residing in New York. Merrow worked as a delivery driver for FedEx in New York from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Merrow has been

eligible to receive overtime pay under the FLSA because Merrow has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

244. Plaintiff Anthony Owens is an individual residing in New York. Owens worked as a delivery driver for FedEx in New York but was employed through intermediary entities that FedEx calls independent service providers. Owens has been eligible to receive overtime pay under the FLSA because Owens has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

245. Plaintiff Peter Ozuna is an individual residing in New York. Ozuna worked as a delivery driver for FedEx in New York from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Ozuna has been eligible to receive overtime pay under the FLSA because Ozuna has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

246. Plaintiff Kenneth Powis is an individual residing in New York. Powis worked as a delivery driver for FedEx in New York from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Powis has been eligible to receive overtime pay under the FLSA because Powis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

247. Plaintiff Jack Putnam is an individual residing in New York. Putnam worked as a delivery driver for FedEx in New York from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Putnam has been

eligible to receive overtime pay under the FLSA because Putnam has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

248. Plaintiff Shawn Veaut is an individual residing in Ohio. Veaut worked as a delivery driver for FedEx in New York from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Veaut has been eligible to receive overtime pay under the FLSA because Veaut has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

249. Plaintiff Twana White is an individual residing in New York. White worked as a delivery driver for FedEx in New York from approximately 2015 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. White has been eligible to receive overtime pay under the FLSA because White has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

250. Plaintiff Jeremy Baker is an individual residing in North Carolina. Baker worked as a delivery driver for FedEx in North Carolina from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Baker has been eligible to receive overtime pay under the FLSA because Baker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

251. Plaintiff Nadine Clement is an individual residing in North Carolina. Clement worked as a delivery driver for FedEx in North Carolina but was employed through intermediary

entities that FedEx calls independent service providers. Clement has been eligible to receive overtime pay under the FLSA because Clement has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

252. Plaintiff Milton Ewing is an individual residing in North Carolina. Ewing worked as a delivery driver for FedEx in North Carolina from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Ewing has been eligible to receive overtime pay under the FLSA because Ewing has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

253. Plaintiff Deas Fenderson is an individual residing in North Carolina. Fenderson worked as a delivery driver for FedEx in North Carolina from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Fenderson has been eligible to receive overtime pay under the FLSA because Fenderson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

254. Plaintiff Rebekah Fortenberry is an individual residing in Maryland. Fortenberry worked as a delivery driver for FedEx in North Carolina but was employed through intermediary entities that FedEx calls independent service providers. Fortenberry has been eligible to receive overtime pay under the FLSA because Fortenberry has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

255. Plaintiff Quincy Glover, Sr. is an individual residing in North Carolina. Glover worked as a delivery driver for FedEx in North Carolina from approximately 2011 to 2024 but was employed through intermediary entities that FedEx calls independent service providers.

Glover has been eligible to receive overtime pay under the FLSA because Glover has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

256. Plaintiff Oleksandr Grakov is an individual residing in North Carolina. Grakov worked as a delivery driver for FedEx in North Carolina from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Grakov has been eligible to receive overtime pay under the FLSA because Grakov has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

257. Plaintiff Casey Hicks is an individual residing in North Carolina. Hicks worked as a delivery driver for FedEx in North Carolina from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Hicks has been eligible to receive overtime pay under the FLSA because Hicks has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

258. Plaintiff Matthew Holloway is an individual residing in North Carolina. Holloway worked as a delivery driver for FedEx in North Carolina from approximately 2011 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Holloway has been eligible to receive overtime pay under the FLSA because Holloway has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

259. Plaintiff Michael Marsh is an individual residing in North Carolina. Marsh worked as a delivery driver for FedEx in North Carolina from approximately 2017 to 2018 but

was employed through intermediary entities that FedEx calls independent service providers. Marsh has been eligible to receive overtime pay under the FLSA because Marsh has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

260. Plaintiff Anshawn Pittman is an individual residing in North Carolina. Pittman worked as a delivery driver for FedEx in North Carolina from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Pittman has been eligible to receive overtime pay under the FLSA because Pittman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

261. Plaintiff Richie Ryan is an individual residing in North Carolina. Ryan worked as a delivery driver for FedEx in North Carolina from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Ryan has been eligible to receive overtime pay under the FLSA because Ryan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

262. Plaintiff Trenton Wylie is an individual residing in North Carolina. Wylie worked as a delivery driver for FedEx in North Carolina from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Wylie has been eligible to receive overtime pay under the FLSA because Wylie has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

263. Plaintiff Amanda Moffitt is an individual residing in North Dakota. Moffitt worked as a delivery driver for FedEx in North Dakota from approximately 2014 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Moffitt has been eligible to receive overtime pay under the FLSA because Moffitt has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

264. Plaintiff Jay Adler is an individual residing in Ohio. Adler worked as a delivery driver for FedEx in Ohio from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Adler has been eligible to receive overtime pay under the FLSA because Adler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

265. Plaintiff Jeffrey Carpenter is an individual residing in Ohio. Carpenter worked as a delivery driver for FedEx in Ohio from approximately 2013 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Carpenter has been eligible to receive overtime pay under the FLSA because Carpenter has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

266. Plaintiff Scotty Dodge is an individual residing in Ohio. Dodge worked as a delivery driver for FedEx in Ohio from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Dodge has been eligible to receive overtime pay under the FLSA because Dodge has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

267. Plaintiff Doug Dorsel is an individual residing in Ohio. Dorsel worked as a delivery driver for FedEx in Ohio from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Dorsel has been eligible to receive overtime pay under the FLSA because Dorsel has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

268. Plaintiff Charles Grant is an individual residing in Ohio. Grant worked as a delivery driver for FedEx in Ohio from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Grant has been eligible to receive overtime pay under the FLSA because Grant has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

269. Plaintiff Shon Holdren is an individual residing in Ohio. Holdren worked as a delivery driver for FedEx in Ohio from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Holdren has been eligible to receive overtime pay under the FLSA because Holdren has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

270. Plaintiff William Martin is an individual residing in Ohio. Martin worked as a delivery driver for FedEx in Ohio from approximately 2012 to 2012 but was employed through intermediary entities that FedEx calls independent service providers. Martin has been eligible to receive overtime pay under the FLSA because Martin has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

271. Plaintiff Ryan Moss is an individual residing in Ohio. Moss worked as a delivery driver for FedEx in Ohio from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Moss has been eligible to

receive overtime pay under the FLSA because Moss has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

272. Plaintiff Shannon Wyszynski is an individual residing in Ohio. Wyszynski worked as a delivery driver for FedEx in Ohio from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Wyszynski has been eligible to receive overtime pay under the FLSA because Wyszynski has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

273. Plaintiff James Allen is an individual residing in Oklahoma. Allen worked as a delivery driver for FedEx in Oklahoma from approximately 2018 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Allen has been eligible to receive overtime pay under the FLSA because Allen has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

274. Plaintiff Christopher Frye is an individual residing in Oklahoma. Frye worked as a delivery driver for FedEx in Oklahoma from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Frye has been eligible to receive overtime pay under the FLSA because Frye has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

275. Plaintiff Tyler Holton is an individual residing in Oklahoma. Holton worked as a delivery driver for FedEx in Oklahoma from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Holton has been

eligible to receive overtime pay under the FLSA because Holton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

276. Plaintiff David Kreh is an individual residing in Oklahoma. Kreh worked as a delivery driver for FedEx in Oklahoma from approximately 2018 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Kreh has been eligible to receive overtime pay under the FLSA because Kreh has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

277. Plaintiff Scott Smith is an individual residing in Oklahoma. Smith worked as a delivery driver for FedEx in Oklahoma from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

278. Plaintiff Colton Tattershall is an individual residing in Oklahoma. Tattershall worked as a delivery driver for FedEx in Oklahoma from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Tattershall has been eligible to receive overtime pay under the FLSA because Tattershall has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

279. Plaintiff Kenneth Thomason is an individual residing in Oklahoma. Thomason worked as a delivery driver for FedEx in Oklahoma from approximately 2011 to 2019 but was

employed through intermediary entities that FedEx calls independent service providers.

Thomason has been eligible to receive overtime pay under the FLSA because Thomason has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

280. Plaintiff Marout Antonian is an individual residing in Oregon. Antonian worked as a delivery driver for FedEx in Oregon but was employed through intermediary entities that FedEx calls independent service providers. Antonian has been eligible to receive overtime pay under the FLSA because Antonian has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

281. Plaintiff Cory Bridger is an individual residing in Washington. Bridger worked as a delivery driver for FedEx in Oregon but was employed through intermediary entities that FedEx calls independent service providers. Bridger has been eligible to receive overtime pay under the FLSA because Bridger has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

282. Plaintiff Derek Jackson is an individual residing in Oregon. Jackson worked as a delivery driver for FedEx in Oregon from approximately 2012 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Jackson has been eligible to receive overtime pay under the FLSA because Jackson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

283. Plaintiff Brittany Miller is an individual residing in Washington. Miller worked as a delivery driver for FedEx in Oregon but was employed through intermediary entities that FedEx calls independent service providers. Miller has been eligible to receive overtime pay

under the FLSA because Miller has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

284. Plaintiff Michael Mutton is an individual residing in Washington. Mutton worked as a delivery driver for FedEx in Oregon from approximately 2024 to 2025 but was employed through intermediary entities that FedEx calls independent service providers. Mutton has been eligible to receive overtime pay under the FLSA because Mutton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

285. Plaintiff Edwin Berrier is an individual residing in Pennsylvania. Berrier worked as a delivery driver for FedEx in Pennsylvania from approximately 2002 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Berrier has been eligible to receive overtime pay under the FLSA because Berrier has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

286. Plaintiff Tonya Bland is an individual residing in Maryland. Bland worked as a delivery driver for FedEx in Pennsylvania from approximately 2017 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Bland has been eligible to receive overtime pay under the FLSA because Bland has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

287. Plaintiff Leland Canady is an individual residing in Pennsylvania. Canady worked as a delivery driver for FedEx in Pennsylvania from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Canady

has been eligible to receive overtime pay under the FLSA because Canady has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

288. Plaintiff Johnston Carter is an individual residing in Pennsylvania. Carter worked as a delivery driver for FedEx in Pennsylvania from approximately 2000 to 2000 but was employed through intermediary entities that FedEx calls independent service providers. Carter has been eligible to receive overtime pay under the FLSA because Carter has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

289. Plaintiff Tyler Clay is an individual residing in Pennsylvania. Clay worked as a delivery driver for FedEx in Pennsylvania but was employed through intermediary entities that FedEx calls independent service providers. Clay has been eligible to receive overtime pay under the FLSA because Clay has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

290. Plaintiff Kenneth Cook is an individual residing in New Jersey. Cook worked as a delivery driver for FedEx in Pennsylvania from approximately 2015 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Cook has been eligible to receive overtime pay under the FLSA because Cook has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

291. Plaintiff Wilder Domond is an individual residing in Pennsylvania. Domond worked as a delivery driver for FedEx in Pennsylvania from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Domond

has been eligible to receive overtime pay under the FLSA because Domond has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

292. Plaintiff Brian Etter is an individual residing in Pennsylvania. Etter worked as a delivery driver for FedEx in Pennsylvania from approximately 2006 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Etter has been eligible to receive overtime pay under the FLSA because Etter has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

293. Plaintiff Chris Janis is an individual residing in Pennsylvania. Janis worked as a delivery driver for FedEx in Pennsylvania from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Janis has been eligible to receive overtime pay under the FLSA because Janis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

294. Plaintiff Frank Lovari is an individual residing in Pennsylvania. Lovari worked as a delivery driver for FedEx in Pennsylvania from approximately 2005 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Lovari has been eligible to receive overtime pay under the FLSA because Lovari has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

295. Plaintiff George Mason is an individual residing in Pennsylvania. Mason worked as a delivery driver for FedEx in Pennsylvania from approximately 2014 to 2019 but was

employed through intermediary entities that FedEx calls independent service providers. Mason has been eligible to receive overtime pay under the FLSA because Mason has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

296. Plaintiff Blaise Mcginley is an individual residing in Pennsylvania. Mcginley worked as a delivery driver for FedEx in Pennsylvania from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Mcginley has been eligible to receive overtime pay under the FLSA because Mcginley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

297. Plaintiff Michael Meteney is an individual residing in Pennsylvania. Meteney worked as a delivery driver for FedEx in Pennsylvania from approximately 2013 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Meteney has been eligible to receive overtime pay under the FLSA because Meteney has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

298. Plaintiff Charlotte Wynn is an individual residing in Pennsylvania. Wynn worked as a delivery driver for FedEx in Pennsylvania from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Wynn has been eligible to receive overtime pay under the FLSA because Wynn has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

299. Plaintiff Michael Myers is an individual residing in Rhode Island. Myers worked as a delivery driver for FedEx in Rhode Island from approximately 2007 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Myers has been eligible to receive overtime pay under the FLSA because Myers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

300. Plaintiff Ben Bryson is an individual residing in South Carolina. Bryson worked as a delivery driver for FedEx in South Carolina but was employed through intermediary entities that FedEx calls independent service providers. Bryson has been eligible to receive overtime pay under the FLSA because Bryson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

301. Plaintiff Paysha Burgess is an individual residing in South Carolina. Burgess worked as a delivery driver for FedEx in South Carolina from approximately 2015 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Burgess has been eligible to receive overtime pay under the FLSA because Burgess has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

302. Plaintiff Anthony Carroll is an individual residing in South Carolina. Carroll worked as a delivery driver for FedEx in South Carolina but was employed through intermediary entities that FedEx calls independent service providers. Carroll has been eligible to receive overtime pay under the FLSA because Carroll has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

303. Plaintiff John Hackett is an individual residing in South Carolina. Hackett worked as a delivery driver for FedEx in South Carolina from approximately 2016 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Hackett has been eligible to receive overtime pay under the FLSA because Hackett has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

304. Plaintiff Kevin Hayes is an individual residing in North Carolina. Hayes worked as a delivery driver for FedEx in South Carolina from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Hayes has been eligible to receive overtime pay under the FLSA because Hayes has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

305. Plaintiff Alvin Hinton is an individual residing in South Carolina. Hinton worked as a delivery driver for FedEx in South Carolina from approximately 2018 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Hinton has been eligible to receive overtime pay under the FLSA because Hinton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

306. Plaintiff Dequalais Oliver is an individual residing in South Carolina. Oliver worked as a delivery driver for FedEx in South Carolina from approximately 2020 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Oliver has been eligible to receive overtime pay under the FLSA because Oliver has driven a

vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

307. Plaintiff Stephanie Small is an individual residing in South Carolina. Small worked as a delivery driver for FedEx in South Carolina but was employed through intermediary entities that FedEx calls independent service providers. Small has been eligible to receive overtime pay under the FLSA because Small has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

308. Plaintiff Taiwan Smith is an individual residing in North Carolina. Smith worked as a delivery driver for FedEx in South Carolina from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

309. Plaintiff Scott Smith is an individual residing in South Carolina. Smith worked as a delivery driver for FedEx in South Carolina from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Smith has been eligible to receive overtime pay under the FLSA because Smith has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

310. Plaintiff Colby Buckles is an individual residing in South Dakota. Buckles worked as a delivery driver for FedEx in South Dakota from approximately 2017 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Buckles has been eligible to receive overtime pay under the FLSA because Buckles has driven a

vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

311. Plaintiff James Allen is an individual residing in Tennessee. Allen worked as a delivery driver for FedEx in Tennessee from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Allen has been eligible to receive overtime pay under the FLSA because Allen has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

312. Plaintiff Michael Bartusch is an individual residing in Georgia. Bartusch worked as a delivery driver for FedEx in Tennessee from approximately 2015 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Bartusch has been eligible to receive overtime pay under the FLSA because Bartusch has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

313. Plaintiff Duncan Beasley is an individual residing in Tennessee. Beasley worked as a delivery driver for FedEx in Tennessee from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Beasley has been eligible to receive overtime pay under the FLSA because Beasley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

314. Plaintiff Preston Depietro is an individual residing in Tennessee. Depietro worked as a delivery driver for FedEx in Tennessee from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Depietro has been

eligible to receive overtime pay under the FLSA because Depietro has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

315. Plaintiff Jeffrey Dittmer is an individual residing in Tennessee. Dittmer worked as a delivery driver for FedEx in Tennessee from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Dittmer has been eligible to receive overtime pay under the FLSA because Dittmer has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

316. Plaintiff Tracey Drake is an individual residing in Tennessee. Drake worked as a delivery driver for FedEx in Tennessee but was employed through intermediary entities that FedEx calls independent service providers. Drake has been eligible to receive overtime pay under the FLSA because Drake has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

317. Plaintiff Steven Edgin is an individual residing in Tennessee. Edgin worked as a delivery driver for FedEx in Tennessee from approximately 2019 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Edgin has been eligible to receive overtime pay under the FLSA because Edgin has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

318. Plaintiff Christopher Freeman is an individual residing in Georgia. Freeman worked as a delivery driver for FedEx in Tennessee from approximately 2018 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Freeman

has been eligible to receive overtime pay under the FLSA because Freeman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

319. Plaintiff Christopher Golden is an individual residing in Tennessee. Golden worked as a delivery driver for FedEx in Tennessee from approximately 2018 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Golden has been eligible to receive overtime pay under the FLSA because Golden has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

320. Plaintiff David Gornowicz is an individual residing in Tennessee. Gornowicz worked as a delivery driver for FedEx in Tennessee from approximately 2021 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Gornowicz has been eligible to receive overtime pay under the FLSA because Gornowicz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

321. Plaintiff Gary Henry is an individual residing in Tennessee. Henry worked as a delivery driver for FedEx in Tennessee from approximately 2013 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Henry has been eligible to receive overtime pay under the FLSA because Henry has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

322. Plaintiff Charles Jackson is an individual residing in Tennessee. Jackson worked as a delivery driver for FedEx in Tennessee from approximately 2005 to 2018 but was employed

through intermediary entities that FedEx calls independent service providers. Jackson has been eligible to receive overtime pay under the FLSA because Jackson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

323. Plaintiff Jamal Jarvis is an individual residing in Tennessee. Jarvis worked as a delivery driver for FedEx in Tennessee from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Jarvis has been eligible to receive overtime pay under the FLSA because Jarvis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

324. Plaintiff Frederick Jones is an individual residing in Ohio. Jones worked as a delivery driver for FedEx in Tennessee from approximately 2018 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Jones has been eligible to receive overtime pay under the FLSA because Jones has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

325. Plaintiff Denisha Lewis is an individual residing in Tennessee. Lewis worked as a delivery driver for FedEx in Tennessee but was employed through intermediary entities that FedEx calls independent service providers. Lewis has been eligible to receive overtime pay under the FLSA because Lewis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

326. Plaintiff Brian Mcdavid is an individual residing in Tennessee. Mcdavid worked as a delivery driver for FedEx in Tennessee from approximately 2014 to 2016 but was employed

through intermediary entities that FedEx calls independent service providers. Mcdavid has been eligible to receive overtime pay under the FLSA because Mcdavid has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

327. Plaintiff Larry McLerran is an individual residing in Tennessee. McLerran worked as a delivery driver for FedEx in Tennessee from approximately 2012 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. McLerran has been eligible to receive overtime pay under the FLSA because McLerran has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

328. Plaintiff Jason Reed is an individual residing in Tennessee. Reed worked as a delivery driver for FedEx in Tennessee from approximately 2014 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Reed has been eligible to receive overtime pay under the FLSA because Reed has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

329. Plaintiff Jerome Rubin is an individual residing in Tennessee. Rubin worked as a delivery driver for FedEx in Tennessee from approximately 2008 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Rubin has been eligible to receive overtime pay under the FLSA because Rubin has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

330. Plaintiff Johnathon Schultz is an individual residing in Tennessee. Schultz worked as a delivery driver for FedEx in Tennessee from approximately 2012 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Schultz has been eligible to receive overtime pay under the FLSA because Schultz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

331. Plaintiff Remolino Torres is an individual residing in Tennessee. Torres worked as a delivery driver for FedEx in Tennessee but was employed through intermediary entities that FedEx calls independent service providers. Torres has been eligible to receive overtime pay under the FLSA because Torres has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

332. Plaintiff Bryan Wachsmuth is an individual residing in Tennessee. Wachsmuth worked as a delivery driver for FedEx in Tennessee from approximately 2009 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Wachsmuth has been eligible to receive overtime pay under the FLSA because Wachsmuth has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

333. Plaintiff George Ackerman is an individual residing in Texas. Ackerman worked as a delivery driver for FedEx in Texas from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Ackerman has been eligible to receive overtime pay under the FLSA because Ackerman has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

334. Plaintiff Jeremy Aguirre is an individual residing in Texas. Aguirre worked as a delivery driver for FedEx in Texas from approximately 2016 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Aguirre has been eligible to receive overtime pay under the FLSA because Aguirre has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

335. Plaintiff Gerardo Almendarez, Jr. is an individual residing in Texas. Almendarez worked as a delivery driver for FedEx in Texas from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Almendarez has been eligible to receive overtime pay under the FLSA because Almendarez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

336. Plaintiff Robert Baker is an individual residing in Texas. Baker worked as a delivery driver for FedEx in Texas from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Baker has been eligible to receive overtime pay under the FLSA because Baker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

337. Plaintiff Patricia Bonner is an individual residing in Texas. Bonner worked as a delivery driver for FedEx in Texas from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Bonner has been eligible to receive overtime pay under the FLSA because Bonner has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

338. Plaintiff Quntevia Bradshaw is an individual residing in Texas. Bradshaw worked as a delivery driver for FedEx in Texas from approximately 2018 to 2020 but was employed

through intermediary entities that FedEx calls independent service providers. Bradshaw has been eligible to receive overtime pay under the FLSA because Bradshaw has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

339. Plaintiff Donna Bryan is an individual residing in Texas. Bryan worked as a delivery driver for FedEx in Texas from approximately 1997 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Bryan has been eligible to receive overtime pay under the FLSA because Bryan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

340. Plaintiff Israel Bueno is an individual residing in Texas. Bueno worked as a delivery driver for FedEx in Texas from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Bueno has been eligible to receive overtime pay under the FLSA because Bueno has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

341. Plaintiff Willie Davis is an individual residing in Texas. Davis worked as a delivery driver for FedEx in Texas from approximately 2010 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Davis has been eligible to receive overtime pay under the FLSA because Davis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

342. Plaintiff Gregory Dixon is an individual residing in Texas. Dixon worked as a delivery driver for FedEx in Texas but was employed through intermediary entities that FedEx calls independent service providers. Dixon has been eligible to receive overtime pay under the

FLSA because Dixon has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

343. Plaintiff James Foxworth is an individual residing in Texas. Foxworth worked as a delivery driver for FedEx in Texas from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Foxworth has been eligible to receive overtime pay under the FLSA because Foxworth has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

344. Plaintiff Gary Hatfield is an individual residing in Texas. Hatfield worked as a delivery driver for FedEx in Texas from approximately 2016 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Hatfield has been eligible to receive overtime pay under the FLSA because Hatfield has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

345. Plaintiff Richard Honeycutt is an individual residing in Texas. Honeycutt worked as a delivery driver for FedEx in Texas from approximately 2014 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Honeycutt has been eligible to receive overtime pay under the FLSA because Honeycutt has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

346. Plaintiff Charles Hosea is an individual residing in Texas. Hosea worked as a delivery driver for FedEx in Texas from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Hosea has been eligible to

receive overtime pay under the FLSA because Hosea has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

347. Plaintiff Darrell Hunt is an individual residing in Texas. Hunt worked as a delivery driver for FedEx in Texas from approximately 2006 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Hunt has been eligible to receive overtime pay under the FLSA because Hunt has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

348. Plaintiff Xavier Jones is an individual residing in Texas. Jones worked as a delivery driver for FedEx in Texas from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Jones has been eligible to receive overtime pay under the FLSA because Jones has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

349. Plaintiff Michael Larsen is an individual residing in Texas. Larsen worked as a delivery driver for FedEx in Texas from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Larsen has been eligible to receive overtime pay under the FLSA because Larsen has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

350. Plaintiff Dejon Lawrence is an individual residing in Texas. Lawrence worked as a delivery driver for FedEx in Texas from approximately 2019 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Lawrence has been eligible to receive overtime pay under the FLSA because Lawrence has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

351. Plaintiff Mildred Manley is an individual residing in Texas. Manley worked as a delivery driver for FedEx in Texas from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Manley has been eligible to receive overtime pay under the FLSA because Manley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

352. Plaintiff Joel Martinez is an individual residing in Texas. Martinez worked as a delivery driver for FedEx in Texas from approximately 2018 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Martinez has been eligible to receive overtime pay under the FLSA because Martinez has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

353. Plaintiff Carolyn McBride is an individual residing in Texas. McBride worked as a delivery driver for FedEx in Texas from approximately 2016 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. McBride has been eligible to receive overtime pay under the FLSA because McBride has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

354. Plaintiff Mario Morante is an individual residing in Florida. Morante worked as a delivery driver for FedEx in Texas but was employed through intermediary entities that FedEx calls independent service providers. Morante has been eligible to receive overtime pay under the FLSA because Morante has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

355. Plaintiff Nevin Pastrano is an individual residing in Texas. Pastrano worked as a delivery driver for FedEx in Texas from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Pastrano has been eligible to receive overtime pay under the FLSA because Pastrano has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

356. Plaintiff Elliot Raynor is an individual residing in Texas. Raynor worked as a delivery driver for FedEx in Texas from approximately 2015 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Raynor has been eligible to receive overtime pay under the FLSA because Raynor has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

357. Plaintiff Brandon Reynolds is an individual residing in Texas. Reynolds worked as a delivery driver for FedEx in Texas from approximately 2019 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Reynolds has been eligible to receive overtime pay under the FLSA because Reynolds has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

358. Plaintiff Jason Rogers is an individual residing in Texas. Rogers worked as a delivery driver for FedEx in Texas but was employed through intermediary entities that FedEx calls independent service providers. Rogers has been eligible to receive overtime pay under the FLSA because Rogers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

359. Plaintiff Luke Stewart is an individual residing in Texas. Stewart worked as a delivery driver for FedEx in Texas from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Stewart has been eligible to receive overtime pay under the FLSA because Stewart has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

360. Plaintiff Quaylon Sutton is an individual residing in Texas. Sutton worked as a delivery driver for FedEx in Texas from approximately 2012 to 2016 but was employed through intermediary entities that FedEx calls independent service providers. Sutton has been eligible to receive overtime pay under the FLSA because Sutton has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

361. Plaintiff Elizabeth Trojnor Riley is an individual residing in Texas. Trojnor Riley worked as a delivery driver for FedEx in Texas from approximately 2015 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Trojnor Riley has been eligible to receive overtime pay under the FLSA because Trojnor Riley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

362. Plaintiff Angela Wadley is an individual residing in Texas. Wadley worked as a delivery driver for FedEx in Texas from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Wadley has been eligible to receive overtime pay under the FLSA because Wadley has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

363. Plaintiff Clint Williams is an individual residing in Texas. Williams worked as a delivery driver for FedEx in Texas from approximately 2019 to 2022 but was employed through

intermediary entities that FedEx calls independent service providers. Williams has been eligible to receive overtime pay under the FLSA because Williams has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

364. Plaintiff Mike Foote is an individual residing in Utah. Foote worked as a delivery driver for FedEx in Utah from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Foote has been eligible to receive overtime pay under the FLSA because Foote has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

365. Plaintiff Thomas Timothy is an individual residing in Utah. Timothy worked as a delivery driver for FedEx in Utah from approximately 2015 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Timothy has been eligible to receive overtime pay under the FLSA because Timothy has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

366. Plaintiff Lee Bayless is an individual residing in Virginia. Bayless worked as a delivery driver for FedEx in Virginia but was employed through intermediary entities that FedEx calls independent service providers. Bayless has been eligible to receive overtime pay under the FLSA because Bayless has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

367. Plaintiff Reynard Black, Jr. is an individual residing in Virginia. Black worked as a delivery driver for FedEx in Virginia but was employed through intermediary entities that FedEx calls independent service providers. Black has been eligible to receive overtime pay under

the FLSA because Black has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

368. Plaintiff Arturo Brown is an individual residing in Virginia. Brown worked as a delivery driver for FedEx in Virginia from approximately 2015 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Brown has been eligible to receive overtime pay under the FLSA because Brown has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

369. Plaintiff Doyle Cardwell is an individual residing in Virginia. Cardwell worked as a delivery driver for FedEx in Virginia from approximately 1962 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Cardwell has been eligible to receive overtime pay under the FLSA because Cardwell has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

370. Plaintiff Rodney Clark is an individual residing in Virginia. Clark worked as a delivery driver for FedEx in Virginia from approximately 2016 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Clark has been eligible to receive overtime pay under the FLSA because Clark has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

371. Plaintiff Dale Dennis is an individual residing in Virginia. Dennis worked as a delivery driver for FedEx in Virginia but was employed through intermediary entities that FedEx calls independent service providers. Dennis has been eligible to receive overtime pay under the

FLSA because Dennis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

372. Plaintiff Ahmad Granby is an individual residing in Virginia. Granby worked as a delivery driver for FedEx in Virginia from approximately 2018 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Granby has been eligible to receive overtime pay under the FLSA because Granby has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

373. Plaintiff James Gusler is an individual residing in Virginia. Gusler worked as a delivery driver for FedEx in Virginia from approximately 2007 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Gusler has been eligible to receive overtime pay under the FLSA because Gusler has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

374. Plaintiff Mark Jones is an individual residing in Virginia. Jones worked as a delivery driver for FedEx in Virginia from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Jones has been eligible to receive overtime pay under the FLSA because Jones has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

375. Plaintiff Felecia Madison is an individual residing in Virginia. Madison worked as a delivery driver for FedEx in Virginia from approximately 2001 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Madison has been

eligible to receive overtime pay under the FLSA because Madison has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

376. Plaintiff Jordan Orr is an individual residing in Virginia. Orr worked as a delivery driver for FedEx in Virginia from approximately 2016 to 2021 but was employed through intermediary entities that FedEx calls independent service providers. Orr has been eligible to receive overtime pay under the FLSA because Orr has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

377. Plaintiff Clifton Richardson is an individual residing in Virginia. Richardson worked as a delivery driver for FedEx in Virginia but was employed through intermediary entities that FedEx calls independent service providers. Richardson has been eligible to receive overtime pay under the FLSA because Richardson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

378. Plaintiff Hope Rogers is an individual residing in Virginia. Rogers worked as a delivery driver for FedEx in Virginia from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Rogers has been eligible to receive overtime pay under the FLSA because Rogers has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

379. Plaintiff Esther Walton is an individual residing in Virginia. Walton worked as a delivery driver for FedEx in Virginia from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Walton has been eligible to receive overtime pay under the FLSA because Walton has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

380. Plaintiff Ruben Delgado is an individual residing in Washington. Delgado worked as a delivery driver for FedEx in Washington from approximately 2018 to 2023 but was employed through intermediary entities that FedEx calls independent service providers. Delgado has been eligible to receive overtime pay under the FLSA because Delgado has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

381. Plaintiff Don Johnson is an individual residing in Washington. Johnson worked as a delivery driver for FedEx in Washington from approximately 2009 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Johnson has been eligible to receive overtime pay under the FLSA because Johnson has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

382. Plaintiff Magrand Kol is an individual residing in Washington. Kol worked as a delivery driver for FedEx in Washington from approximately 2016 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Kol has been eligible to receive overtime pay under the FLSA because Kol has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

383. Plaintiff Terra McGinn is an individual residing in Washington. McGinn worked as a delivery driver for FedEx in Washington from approximately 2014 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. McGinn has been

eligible to receive overtime pay under the FLSA because McGinn has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

384. Plaintiff Jennifer Pingree is an individual residing in Washington. Pingree worked as a delivery driver for FedEx in Washington from approximately 2014 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Pingree has been eligible to receive overtime pay under the FLSA because Pingree has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

385. Plaintiff Donovan Satterwhite is an individual residing in Washington. Satterwhite worked as a delivery driver for FedEx in Washington from approximately 2017 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Satterwhite has been eligible to receive overtime pay under the FLSA because Satterwhite has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

386. Plaintiff Tim Schultheis is an individual residing in Washington. Schultheis worked as a delivery driver for FedEx in Washington from approximately 2014 to 2017 but was employed through intermediary entities that FedEx calls independent service providers. Schultheis has been eligible to receive overtime pay under the FLSA because Schultheis has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

387. Plaintiff Patrick Sullivan is an individual residing in North Carolina. Sullivan worked as a delivery driver for FedEx in Washington from approximately 2017 to 2019 but was

employed through intermediary entities that FedEx calls independent service providers. Sullivan has been eligible to receive overtime pay under the FLSA because Sullivan has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

388. Plaintiff Scott Veng is an individual residing in Washington. Veng worked as a delivery driver for FedEx in Washington from approximately 2013 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Veng has been eligible to receive overtime pay under the FLSA because Veng has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

389. Plaintiff Neil Austen is an individual residing in West Virginia. Austen worked as a delivery driver for FedEx in West Virginia from approximately 2015 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Austen has been eligible to receive overtime pay under the FLSA because Austen has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

390. Plaintiff Devin Boyce is an individual residing in West Virginia. Boyce worked as a delivery driver for FedEx in West Virginia from approximately 2017 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Boyce has been eligible to receive overtime pay under the FLSA because Boyce has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

391. Plaintiff Lance Schultz is an individual residing in West Virginia. Schultz worked as a delivery driver for FedEx in West Virginia from approximately 2015 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Schultz has been eligible to receive overtime pay under the FLSA because Schultz has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

392. Plaintiff Donald Barber is an individual residing in Wisconsin. Barber worked as a delivery driver for FedEx in Wisconsin from approximately 2019 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Barber has been eligible to receive overtime pay under the FLSA because Barber has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

393. Plaintiff Nicholas Buchel is an individual residing in Wisconsin. Buchel worked as a delivery driver for FedEx in Wisconsin from approximately 2008 to 2024 but was employed through intermediary entities that FedEx calls independent service providers. Buchel has been eligible to receive overtime pay under the FLSA because Buchel has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

394. Plaintiff Anthony Criswell is an individual residing in Wisconsin. Criswell worked as a delivery driver for FedEx in Wisconsin from approximately 2018 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Criswell has been eligible to receive overtime pay under the FLSA because Criswell has driven a vehicle

weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

395. Plaintiff James Eberle is an individual residing in Wisconsin. Eberle worked as a delivery driver for FedEx in Wisconsin from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Eberle has been eligible to receive overtime pay under the FLSA because Eberle has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

396. Plaintiff Sandesh Gurung is an individual residing in Wisconsin. Gurung worked as a delivery driver for FedEx in Wisconsin from approximately 2020 to 2022 but was employed through intermediary entities that FedEx calls independent service providers. Gurung has been eligible to receive overtime pay under the FLSA because Gurung has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

397. Plaintiff Angelina Guthrie is an individual residing in Wisconsin. Guthrie worked as a delivery driver for FedEx in Wisconsin but was employed through intermediary entities that FedEx calls independent service providers. Guthrie has been eligible to receive overtime pay under the FLSA because Guthrie has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

398. Plaintiff Matthew Lund is an individual residing in Wisconsin. Lund worked as a delivery driver for FedEx in Wisconsin from approximately 2017 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Lund has been eligible to receive overtime pay under the FLSA because Lund has driven a vehicle weighing

less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

399. Plaintiff Kristine Meinhardt is an individual residing in Wisconsin. Meinhardt worked as a delivery driver for FedEx in Wisconsin from approximately 2016 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Meinhardt has been eligible to receive overtime pay under the FLSA because Meinhardt has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

400. Plaintiff Daniel Schimanski is an individual residing in Wisconsin. Schimanski worked as a delivery driver for FedEx in Wisconsin from approximately 2018 to 2020 but was employed through intermediary entities that FedEx calls independent service providers. Schimanski has been eligible to receive overtime pay under the FLSA because Schimanski has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

401. Plaintiff Richard Walker is an individual residing in Wisconsin. Walker worked as a delivery driver for FedEx in Wisconsin from approximately 2016 to 2018 but was employed through intermediary entities that FedEx calls independent service providers. Walker has been eligible to receive overtime pay under the FLSA because Walker has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

402. Plaintiff Larry Yates is an individual residing in Wyoming. Yates worked as a delivery driver for FedEx in Wyoming from approximately 2017 to 2019 but was employed through intermediary entities that FedEx calls independent service providers. Yates has been

eligible to receive overtime pay under the FLSA because Yates has driven a vehicle weighing less than 10,001 pounds but has not received overtime pay for hours worked beyond 40 hours per week.

403. At all relevant times, Plaintiffs worked for FedEx.

404. FedEx Ground Package System, Inc. is a Delaware corporation with its principal place of business in Pittsburgh, Pennsylvania.

405. FedEx Corporation, formerly known as Federal Express Corporation, is a Delaware corporation with its principal place of business in Memphis, Tennessee.

406. FedEx Corporation is the successor, by merger, to FedEx Ground Package System, Inc.

407. FedEx Ground Package System, Inc. and FedEx Corporation are referred to herein collectively as “FedEx.”

408. At all relevant times, FedEx has engaged in the business of the delivery of packages nationwide and within the state of Pennsylvania.

409. FedEx employs thousands of individuals across the country, including Plaintiffs, who have engaged in interstate commerce.

410. FedEx is an employer under the FLSA and applicable state laws.

FACTS

411. FedEx operates a package pickup and delivery business servicing customers throughout the United States.

412. FedEx employs thousands of package delivery drivers within the United States, including the named Plaintiffs, who: (a) work for FedEx through intermediary employers called “independent service providers” (ISPs); (b) are classified as “employees” of the FedEx ISPs; (c)

have worked more than forty hours per week delivering packages for FedEx but are not paid time-and-a-half compensation for hours worked beyond forty each week; and (d) drive, in whole or in part, vehicles with a gross vehicle weight rating of 10,001 pounds or less. These individuals are referred to herein as “delivery drivers.”

413. Before instituting the ISP model of employing its delivery drivers through intermediary entities, FedEx relied entirely on delivery drivers that it hired directly and purported to classify as “independent contractors”, pursuant to standard operating agreements that FedEx required its drivers to sign. After years of defending litigation challenging the employment status of these drivers around the country – during which time multiple courts around the country held that FedEx misclassified its delivery drivers as independent contractors when they were actually FedEx’s employees under various state wage laws¹ – FedEx shifted its method of hiring drivers in many states by contracting with ISPs in an effort to continue to avoid liability under the wage laws for its delivery drivers.

414. FedEx ISPs are typically responsible for three or more FedEx delivery routes. FedEx requires its ISPs to hire FedEx’s workforce of delivery drivers, and FedEx further requires the ISPs to classify these delivery drivers as the ISPs’ employees.

¹ See, e.g., *Craig et al. v. FedEx Ground Package System, Inc.*, 335 P.3d 66 (Kan. 2014) (FedEx drivers in Kansas were misclassified as independent contractors when they were employees as a matter of law); *Alexander, et al. v. FedEx Ground Package System, Inc.*, 765 F.3d 981, 997 (9th Cir. 2014) (same, for FedEx delivery drivers in California); *Slayman, et al. v. FedEx Ground Package System, Inc.*, 765 F.3d 1033, 1046-47 (9th Cir. 2014) (FedEx delivery drivers in Oregon were FedEx’s employees under Oregon’s economic reality test and Oregon’s right to control test). FedEx ultimately settled these and other pending cases challenging its misclassification of drivers as independent contractors.

415. However, based on the economic realities of the relationship between FedEx and these drivers, it is clear that the delivery drivers working under the intermediary ISPs are also FedEx employees under the FLSA.

416. FedEx operates a nationwide network of package handling terminals to serve its customers' package pickup and delivery needs around the country. FedEx advertises its delivery service and negotiates with its customers to provide the package pick-ups and deliveries that are performed by the Plaintiffs and other delivery drivers.

417. Plaintiffs and other delivery drivers working under ISPs have typically worked full-time and exclusively as FedEx drivers, delivering FedEx's packages to FedEx customers while wearing FedEx uniforms and driving vehicles bearing FedEx's logos and color scheme.

418. Plaintiffs and other delivery drivers working under ISPs have worked out of FedEx-owned and managed terminals throughout the country, where FedEx managers, package handlers, and other FedEx employees oversee and manage the package delivery operations.

419. The services rendered by Plaintiffs and other delivery drivers working under ISPs are an integral part of FedEx's business because FedEx is in the business of package delivery, and Plaintiffs and these other delivery drivers physically deliver packages to FedEx's customers on FedEx's behalf.

420. Plaintiffs and other delivery drivers working under ISPs have performed their delivery work on strict and predictable schedules pursuant to FedEx's same-day delivery requirements. The drivers' schedules are dictated by the volume of packages that FedEx requires be delivered each day on their routes. Neither these drivers, nor the intermediary ISPs who they work under, have any control over the volume of package pickup and delivery work that FedEx assigns the drivers.

421. FedEx micromanages how Plaintiffs and other delivery drivers working under ISPs perform their work. Some of this micromanaging is performed directly by FedEx managers, and some is performed by the ISPs, pursuant to standards and requirements established by FedEx (and enforced by FedEx). For example:

a. FedEx requires that the delivery drivers have specific equipment on their van when they perform deliveries for FedEx;

b. FedEx requires the delivery drivers to wear a uniform bearing FedEx's logos and color scheme and to maintain personal appearance standards established by FedEx;

c. FedEx requires the delivery drivers to place specific signage on their vans bearing FedEx's name and logo;

d. FedEx assigns the specific packages that the delivery drivers must deliver and when the packages must be delivered;

e. FedEx requires the drivers to scan all assigned packages with a specific scanner designated by FedEx upon loading each morning and upon delivery;

f. FedEx requires the drivers to begin and end each day at a designated terminal operated by FedEx;

g. Customer comments and complaints regarding the drivers' job performance are made directly to FedEx, who uses its own discretion on what action to take;

h. FedEx has the authority to require its ISPs to terminate the drivers working under them if FedEx believes they should be terminated; and

i. FedEx closely monitors the job performance of the drivers, tracking whether each delivery is "successful" based on FedEx's own standards.

422. Some FedEx drivers working under ISPs have worked for different ISPs at times, and even at times directly for FedEx, but their work responsibilities, and procedures they have been required to follow, have not differed in any material way regardless of which ISP they have worked under or whether they have worked directly for FedEx.

423. For example, many FedEx drivers were initially hired directly by FedEx to perform its deliveries, until FedEx told drivers they had to work under an ISP. These drivers' responsibilities and the procedures they were required to follow did not change in any material way following the conversion to drivers working under ISPs. Drivers continued to report to FedEx terminals each morning, drove a vehicle with a FedEx logo on it, and followed FedEx procedures to complete their assigned deliveries.

424. FedEx drivers, including drivers such as the Plaintiffs who have worked under intermediary ISPs, have routinely worked more than forty hours per week.

425. Plaintiffs have driven trucks weighing less than 10,001 pounds. They are thus eligible for overtime pay under the FLSA and state law.

426. However, Plaintiffs have not received all overtime pay for their work beyond 40 hours per week.

427. Because FedEx is Plaintiffs' employer under the FLSA and applicable state laws, FedEx is liable to Plaintiffs for the unpaid overtime.

428. FedEx has avoided its responsibilities under the FLSA and applicable state laws by establishing a system through which FedEx employs Plaintiffs and other drivers through intermediary ISPs. FedEx knew, or should have known, that Plaintiffs and other drivers were not paid overtime that they were owed. FedEx has thus acted with reckless disregard for Plaintiffs' rights.

429. However, regardless of FedEx’s actual or constructive knowledge of this fact, FedEx is Plaintiffs’ “employer,” as defined by the FLSA and applicable state laws. FedEx is therefore liable for any overtime payments that are due to Plaintiffs other delivery drivers who have worked under ISPs.

COUNT I
(Unpaid Overtime Under the FLSA)

430. The FLSA, 29 U.S.C. § 207(a)(1), requires that employees receive overtime premium pay of “not less than one and one-half times” their regular pay rate for hours worked beyond 40 per workweek. FedEx is liable under the FLSA for unpaid overtime owed to Plaintiffs. FedEx’s violation of the FLSA has been willful and in reckless disregard of these drivers’ rights.

COUNT II
(Unpaid Overtime under California Law)

431. California entitles employees to overtime premium compensation “at the rate of no less than one and one-half times the regular rate of pay” for hours worked beyond eight hours per day or 40 hours per week. Cal. Lab. Code § 510; *see also* Cal. Lab. Code §§ 1194, 1198. California law also entitles employees to overtime premium “at the rate of no less than twice the regular rate of pay for an employee” for hours beyond 12 hours in one day. Cal. Lab. Code § 510. FedEx is liable under California law for unpaid overtime owed to the Plaintiffs who worked in California.

COUNT III
(Unpaid Overtime Under Colorado Law)

432. Colorado law entitles employees to overtime premium compensation “at time and one-half of the regular rate of pay” for hours worked beyond 40 per week, 12 hours per day, or

12 consecutive hours. 7 Colo. Code Regs. § 1103-1:4. FedEx is liable under Colorado law for unpaid overtime owed to drivers who worked in Colorado.

COUNT IV
(Unpaid Overtime Under New Mexico Law)

433. New Mexico law entitles employees to overtime premium compensation at “one and one-half times the employee’s regular hourly rate of pay” for hours worked beyond 40 per week. N.M. Stat. Ann. § 50-4-22. FedEx is liable under New Mexico law for unpaid overtime owed to drivers who worked in New Mexico.

COUNT V
(Unpaid Overtime Under New York Law)

434. New York law entitles employees to overtime premium compensation “one and one-half times the employee’s regular rate” for hours worked beyond 40 per week. N.Y. Comp. Codes R. & Regs. tit. 12, § 142-2.2. FedEx is liable under New York law for unpaid overtime owed to drivers who worked in New York.

COUNT VI
(Unpaid Overtime Under Washington Law)

435. Washington law entitles employees to overtime premium compensation “at a rate not less than one and one-half times the regular rate at which he or she is employed” for hours worked beyond 40 per week. Wash. Rev. Code Ann. § 49.46.130. FedEx is liable under Washington law for unpaid overtime owed to the Plaintiffs who worked in Washington.

COUNT VII
(Declaratory Judgment)

436. Pursuant to Federal Rule of Civil Procedure 57 and 28 U.S.C. §§ 2201 and 2202, Plaintiffs request a declaration that they were FedEx’s employees within the meaning of the FLSA and applicable state laws.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs seek the following relief:

- A. Restitution for all unpaid overtime owed to the drivers;
- B. Liquidated damages and prejudgment interest, pursuant to the FLSA and applicable state laws;
- C. All remedies provided by applicable state laws;
- D. Litigation costs, expenses, and attorneys' fees;
- E. Judgment declaring that Plaintiffs were FedEx's employees within the meaning of the FLSA and applicable state laws; and
- F. Such other and further relief as this Court deems just and proper.

JURY TRIAL DEMAND

Plaintiffs demand a jury trial on their claims.

Dated: August 6, 2024

Respectfully submitted,

Sarah Schalman-Bergen

Shannon Liss-Riordan (*pro hac vice* forthcoming)

Harold Lichten (*pro hac vice* forthcoming)

Sarah Schalman-Bergen (PA Bar No. 206211)

Matthew Carrieri (*pro hac vice* forthcoming)

LICHTEN & LISS-RIORDAN, P.C.

729 Boylston Street, Suite 2000

Boston, Massachusetts 02116

(617) 994-5800

sliss@llrlaw.com

hlichten@llrlaw.com

ssb@llrlaw.com

mcarrieri@llrlaw.com

Jeremy Abay (PA Bar No. 316730)

LICHTEN & LISS-RIORDAN, P.C.

76 E. Euclid Avenue, Suite 101

Haddonfield, New Jersey 08035

(856) 509-5346

jabay@llrlaw.com

Attorneys for Plaintiffs